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1 BY MR. ISAACSON:

2 Q. So, as I understand it, you are relying --  
3 for your testimony as to Topic 10, you are relying  
4 on information from Toni Qiu and Robert Calico,  
5 which you are not willing to provide us today?

08:53:58

6 MR. FUNG: Objection. Form.

7 Counsel, I -- I don't understand.

8 Are you asking her if she's relying on  
9 facts communicated or relying on the privileged  
10 communications?

08:54:10

11 MR. ISAACSON: I am -- I am talking about  
12 her testimony to answer the question in -- the --  
13 the information to Topic 10 that she's prepared to  
14 testify about today.

15 MR. FUNG: She's obviously had privileged  
16 communications with counsel. Your question was  
17 directed to that.

08:54:21

18 If you want to ask her whether --

19 MR. ISAACSON: My --

20 MR. FUNG: -- she's relying on any facts  
21 communicated by counsel, you can.

08:54:26

22 MR. ISAACSON: Well, let's try that.

23 BY MR. ISAACSON:

24 Q. Are you relying on -- in testifying about  
25 Topic 10, "The NUVIA ALA, including the drafting,

08:54:38

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1 negotiation, interpretation, and construction" [as  
2 read], are you relying on facts provided to you by  
3 in-house counsel at Arm, Toni Qiu or Robert Calico?

4 A. I don't think I understand the question.

5 Q. So, for example, are you relying for any 08:55:06  
6 facts on -- concerning the drafting, negotiation,  
7 interpretation, or construction of the Nuvia ALA  
8 that you are prepared to testify about today that  
9 you learned from Toni Qiu or Robert Calico?

10 MR. FUNG: Same objection as to privilege. 08:55:37

11 I will caution the witness not to reveal  
12 privileged communications.

13 If there are any facts on which you're  
14 relying on, you may testify as to those facts.

15 THE WITNESS: I don't think I can answer 08:55:49  
16 that without disclosing privileged information.

17 BY MR. ISAACSON:

18 Q. Okay. Did Toni Qiu tell you any  
19 information about the drafting, negotiation,  
20 interpretation, or construction of the Nuvia ALA 08:55:57  
21 that -- that you are going to testify about today  
22 when we ask you about that?

23 MR. FUNG: Same objection as to privilege.

24 THE WITNESS: No.

25 BY MR. ISAACSON: 08:56:16



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1 Q. Okay. Did Robert Calico tell you any  
2 facts about the drafting, negotiation,  
3 interpretation, or construction of the Nuvia ALA  
4 that you are prepared to testify about today?

5 MR. FUNG: Same objection as to privilege. 08:56:27

6 Same caution to the witness.

7 THE WITNESS: No.

8 BY MR. ISAACSON:

9 Q. Okay. Did you review any documents  
10 concern- -- concerning the drafting, negotiation, 08:56:41  
11 interpretation, or construction of the Nuvia ALA and  
12 any of its annexes?

13 MR. FUNG: I'll object to the extent it  
14 calls for privilege.

15 You can answer that "yes" or "no." 08:56:51

16 THE WITNESS: Did I review any agreements  
17 in preparing?

18 BY MR. ISAACSON:

19 Q. Any documents; that would include  
20 agreements. 08:57:00

21 A. Yes.

22 Q. Okay. The -- is it your understanding  
23 that [REDACTED]

[REDACTED]

25 A. Yes. 08:57:15

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1 Q. And you were involved in negotiating and  
2 drafting the Nuvia architectural license agreement?

3 A. Yes.

4 Q. Okay. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 A. That's correct.

9 Q. Okay. [REDACTED]

[REDACTED]

08:57:43

11 A. That's my understanding, yes.

12 Q. Okay. And that's your understanding from  
13 your work at the time and the -- during the  
14 negotiations?

15 A. That's right.

08:57:54

16 Q. Okay. You were not the primary con- --  
17 point of contact for Nuvia during the negotiations  
18 and drafting of the Nuvia ALA; correct?

19 A. That's correct.

20 Q. Did you send e-mails to Nuvia as part of  
21 those negotiations?

08:58:02

22 A. I don't remember.

23 Q. Okay. If you had sent any e-mails to  
24 Nuvia as part of the negotiation, your practice  
25 would have been to copy Mr. Herbert on those

08:58:15

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1 e-mails; is that right?

2 A. If that had -- if I had done that, yes.

3 Q. Okay. Did you have meetings with Nuvia  
4 about the negotiation or drafting of the Nuv- -- of  
5 the Nuvia A- -- ALA?

08:58:26

6 A. I don't remember.

7 Q. If you had met with Nuvia about the  
8 drafting or negoti- -- drafting or negotiation of  
9 the Nuvia ALA, Mr. Herbert would have been there; is  
10 that correct?

08:58:44

11 A. I don't remember meeting with them; but if  
12 I had, then, yes, he would have been there.

13 Q. Okay. Do you think such meetings took  
14 place?

15 A. I don't remember.

08:58:53

16 Q. What about phone calls? Do you -- did you  
17 have phone calls or, even back then, Zoom calls,  
18 video calls, with Nuvia about the ALA?

19 A. I don't remember.

20 Q. Do you recall any communications with  
21 Nuvia to discuss proposed language of the ALA?

08:59:06

22 A. I don't remember.

23 Q. Okay. Approximately how long did the  
24 negotiations for the ALA take place?

25 A. I don't remember.

08:59:27

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1 Q. Do you remember whether it was one month,  
2 six months, a year? Any -- any estimate?

3 A. I don't remember.

4 Q. Okay. And you don't recall a single  
5 communication that you had with Nuvia about the -- 08:59:44  
6 about the negotiation or language of the ALA; is  
7 that right?

8 MR. FUNG: Objection. Form.

9 THE WITNESS: No, I don't remember.

10 BY MR. ISAACSON: 08:59:56

11 Q. Okay. And how frequently during those  
12 negotiations did you communicate with Mr. Herbert  
13 about the discussions that were going on with Nuvia  
14 about the ALA?

15 A. I don't remember. 09:00:12

16 Q. Okay. Do you remember whether it was more  
17 than a handful of times?

18 A. I don't remember.

19 Q. Did you -- did you communicate with anyone  
20 else at Arm about the -- the language or negotiation 09:00:27  
21 of the ALA other than Mr. Herbert?

22 A. I don't remember.

23 Q. Okay. You didn't talk to Mr. Herbert to  
24 prepare for this deposition; is that correct?

25 A. That's correct. 09:00:42

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1 Q. Did you review his deposition transcript?

2 A. No.

3 Q. To prepare for this deposition, did you

4 learn anything about the communications between

5 Nuvia and Arm about the negotiation or language of 09:00:59

6 the ALA?

7 MR. FUNG: Objection. Form.

8 THE WITNESS: No.

9 BY MR. ISAACSON:

10 Q. So in terms of the actual communications 09:01:19

11 that went on between Nuvia and Arm about the

12 negotiations and language of the ALA with Nuvia, you

13 don't re- -- you yourself were involved but don't

14 recall any of those communications, and you've not

15 done anything in preparing for this deposition to 09:01:42

16 learn about those communications?

17 MR. FUNG: Objection. Form.

18 THE WITNESS: No.

19 BY MR. ISAACSON:

20 Q. So I think we've got a double negative 09:01:50

21 there because you've said no, and I think you were

22 meaning to say I had it correctly. So let me go

23 back over it. And I apologize because that's

24 probably the fault of my question.

25 In terms of the actual communications that 09:02:04

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1       went on between Nuvia and Arm about the negotiation  
2       language of the ALA with Nuvia, you were involved,  
3       but you don't recall any of those communications.

4               Am I correct about that?

5           A.     That's correct. 09:02:17

6           Q.     Okay. And am I also correct that you've  
7       not done anything in preparing for this deposition  
8       to learn about those communications between Nuvia  
9       and Arm about the ALA?

10           MR. FUNG: Objection. Form. 09:02:27

11           THE WITNESS: That's correct.

12       BY MR. ISAACSON:

13           Q.     Who was the most senior person at Arm who  
14       had to sign off on the ALA?

15           MR. FUNG: Objection. Form. 09:02:42

16           THE WITNESS: I don't know.

17       BY MR. ISAACSON:

18           Q.     Do you know any individuals at Arm who had  
19       to approve the ALA with Nuvia?

20           A.     No. 09:02:55

21           Q.     Do you know who at Nuvia anyone at Arm had  
22       communications with about the ALA?

23           A.     I'm sorry, could you repeat the question,  
24       please.

25           Q.     All right. 09:03:16

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1                   So in- -- individuals at Nuvia is what I'm  
2                   asking about.

3                   When Arm had discussions with Nuvia about  
4                   the ALA, do you know who at Nuvia they were talking  
5                   to?

09:03:27

6                   A.    I think Gerard Williams.

7                   Q.    Anybody else?

8                   A.    Not that I know of.

9                   Q.    And at the time you became -- how did you  
10                  become involved in the Nuvia ALA? What do you  
11                  remember?

09:03:41

12                  MR. FUNG: Objection. Form.

13                  THE WITNESS: I normally work with Tim  
14                  Herbert, and so I usually do his transactions.

15                  BY MR. ISAACSON:

09:03:54

16                  Q.    Is that true today?

17                  A.    No. He doesn't work at Arm anymore.

18                  Q.    Oh, that's right.

19                  Up until he left was that true?

20                  A.    Yes.

09:04:03

21                  Q.    Okay. And so do you recall Mr. Herbert  
22                  actually involving you in the Nuvia ALA?

23                  MR. FUNG: Objection. Form.

24                  THE WITNESS: I did the agreement, yes --

25                  BY MR. ISAACSON:

09:04:18

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1 Q. And --

2 A. -- so I worked with Mr. Herbert.

3 Q. All right.

4 But do you remember any communications you

5 had with Mr. Herbert about that agreement?

09:04:26

6 A. No.

7 MR. FUNG: Objection. Form.

8 BY MR. ISAACSON:

9 Q. Did you have the understanding that Nuvia

10 wanted to develop an Arm-compliant server chip?

09:04:36

11 MR. FUNG: Objection. Form.

12 THE WITNESS: I understood that they

13 wanted to develop their own architecture core.

14 BY MR. ISAACSON:

15 Q. Did you understand that they wanted to

09:04:54

16 develop their own architecture core for ser- -- for

17 high end servers?

18 MR. FUNG: Objection. Form.

19 THE WITNESS: I understood that they

20 wanted to develop an architecture core.

09:05:06

21 BY MR. ISAACSON:

22 Q. Did you know what the core was for?

23 A. No.

24 Q. Okay. Did you know whether the core would

25 be part of a full system on a chip?

09:05:14



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1 A. No. I did not know.

2 Q. Did you know whether Nuvia intended to be  
3 a supplier of chips?

4 A. I did not know.

5 Q. All right. 09:05:25

6 MR. ISAACSON: Let's have April 18.

7 This will be 184.

8 (Tran Deposition Exhibit 184 was marked  
9 for identification.)

10 THE WITNESS: Thank you. 09:06:10

11 BY MR. ISAACSON:

12 Q. All right.

13 Exhibit 184 is an e-mail from Tim Herbert  
14 to Gerard Williams on which you are copied, dated  
15 April 18th, 2019, on the subject of the 09:06:19

16 [REDACTED] with  
17 attachments. It is Bates stamped QCARM\_3315932  
18 through '963.

19 All right. Do you recognize this as an  
20 e-mail that you received in -- around this date? 09:06:44

21 A. I don't remember the e-mail.

22 Q. Okay. Did you review this e-mail as part  
23 of your preparation as a 30(b)(6) witness?

24 MR. FUNG: Counsel, I'm going to object to  
25 the line of questions asking what she did to prepare 09:06:59

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1 for the deposition as calling for privilege. Again,  
2 if you want to ask her if any documents refresh her  
3 recollection, or if there are any documents she's  
4 relying on for the basis of her testimony --

5 THE COURT REPORTER: Could you slow down, 09:07:10  
6 Counsel, a bit.

7 MR. FUNG: Sure thing.

8 If you want to ask her whether any  
9 documents refreshed her recollection or whether any  
10 documents are forming the basis of her 30(b)(6) 09:07:15  
11 testimony, you may do so. Otherwise, her  
12 preparations for preparing for to- -- today's  
13 deposition are privileged. So I'll object --

14 MR. ISAACSON: So I just -- just for the  
15 record, what a witness does to prepare for a 09:07:28  
16 30(b)(6) witness and whether they are prepared is  
17 not privileged. And so, if the witness is not going  
18 to disclose -- what we're going to say based --  
19 based on this -- that we have severe questions at  
20 this point as to whether this witness prepared 09:07:41  
21 adequately for this deposition.

22 So if your position is that what she did  
23 to prepare is privileged, you can instruct her not  
24 to answer. We don't think that's proper. But we  
25 are -- when we say she didn't prepare, and you're 09:07:53

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1 not going to come back later and say, oh, yes, she  
2 did.

3 MR. FUNG: You are asking her to disclose  
4 communications with counsel, as well as documents --

5 MR. ISAACSON: I'm asking her what she -- 09:08:04

6 MR. FUNG: -- we showed her in  
7 preparation --

8 (Simultaneous speaking.)

9 THE COURT REPORTER: One person at a time,  
10 please.

11 MR. ISAACSON: So, I just want -- at the  
12 point --

13 MR. FUNG: Let me finish, please.

14 MR. ISAACSON: -- at this point, just  
15 instruct her not to answer or instruct her to 09:08:10  
16 answer, and let's move on.

17 MR. FUNG: No. Let me finish my objection  
18 because you have mischaracterized my position.

19 She's sitting here as a -- both a 30(b)(1) and  
20 30(b)(6) witness. Obviously, we prepared her in her 09:08:21

21 capacity as both. So when you ask a question like  
22 that, open ended, it gets into a -- questions of

23 privilege. So I'm going to object as call- -- as to  
24 that question as calling for privilege. And I'm

25 going to caution the witness not to reveal the 09:08:32

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1 contents of any privileged communications.

2 MR. ISAACSON: I will repeat my non  
3 open-ended question.

4 BY MR. ISAACSON:

5 Q. Did you review this e-mail as part of your 09:08:41  
6 preparation as a 30(b)(6) witness?

7 MR. FUNG: Same objection.

8 Caution the witness not to reveal the  
9 contents of any privileged communication.

10 THE WITNESS: No. 09:08:51

11 BY MR. ISAACSON:

12 Q. Did you review any drafts of the ALA as  
13 part of the -- your preparation as a 30(b)(6)  
14 witness?

15 MR. FUNG: Same objection as to privilege. 09:09:03

16 Caution the witness not to reveal the  
17 contents of any privileged communications.

18 THE WITNESS: I reviewed the final version  
19 of the ALA.

20 BY MR. ISAACSON: 09:09:15

21 Q. So as part of your preparation as a  
22 30(b)(6) witness, you reviewed the final version of  
23 the ALA with Nuvia, you did not review any earlier  
24 drafts?

25 MR. FUNG: Objection. Form. 09:09:25

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1 THE WITNESS: No, I did not look at  
2 drafts.

3 BY MR. ISAACSON:

4 Q. Do you agree with me that this is an  
5 e-mail that you would have received on or about 09:09:37  
6 April 18, 2019, referring to Exhibit 184?

7 A. I agree that it's an e-mail with my name  
8 on it.

9 Q. All right.

10 And you would have been copied on these 09:09:48  
11 e-mails because you were working on [verbatim]  
12 Mr. Herbert about -- on the ALA with Nuvia; is that  
13 correct?

14 MR. FUNG: Objection. Form.

15 THE WITNESS: Sometimes there are e-mails 09:09:59  
16 sent without me on it.

17 BY MR. ISAACSON:

18 Q. Okay. Do you understand that Exhibit 184,  
19 by reading its contents and the fact it was produced  
20 by your company, is an e-mail from Mr. Herbert on 09:10:10  
21 which you were copied because you were working  
22 together on the architectural license agreement for  
23 Nuvia?

24 MR. FUNG: Objection to form. I would  
25 also note for the record, this has a Qualcomm Bates 09:10:20

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1 number, so it was not produce by --

2 MR. ISAACSON: Sorry. Produced by  
3 Qualcomm. Thank you, though. I -- I stand  
4 corrected on that.

5 THE WITNESS: I'm sorry, what is the 09:10:29  
6 question?

7 BY MR. ISAACSON:

8 Q. Right. Do you understand that because  
9 Qualcomm received this e-mail at -- from  
10 Mr. Herbert, on which you were copied, and given its 09:10:35  
11 subject matter and its contents, that this is an  
12 e-mail that you were copied on because you were  
13 working with Mr. Herbert on the ALA with Nuvia?

14 MR. FUNG: Objection as -- objection as to  
15 form. 09:10:48

16 THE WITNESS: I worked on the ALA, and  
17 this is an e-mail that seems to have me copied on  
18 it.

19 BY MR. ISAACSON:

20 Q. All right. 09:11:02

21 And do you understand from the contents of  
22 this that the attached ALA is a document drafted by  
23 Arm?

24 A. The e-mail says the contract is coming  
25 from Arm. 09:11:26

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1 Q. And so, is it you -- is it your  
2 understanding based on the e-mail that this document  
3 would have been drafted by Arm?

4 A. The e-mail says that this was coming from  
5 Arm, so yes.

09:11:40

6 Q. Okay. And would you have been the person  
7 who drafted the attachments?

8 A. Yes.

9 Q. Okay. Oh, I may mispronounce this  
10 individual's name. He's also copied on this. David  
11 Brittain?

09:11:54

12 A. Brittain.

13 Q. Brittain. And who is David Brittain?

14 A. He's a field applications engineer.

15 Q. Would you explain what that means in this  
16 context?

09:12:03

17 A. He has technical information and can help  
18 the customer understand technical aspects of the Arm  
19 technology.

20 Q. All right.

09:12:14

21 In drafting the -- the document here,  
22 the -- the technical license ag- -- technology  
23 license agreement ALA, which I've always found  
24 confusing, the -- [REDACTED]

09:12:33

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1

2

MR. FUNG: Objection as to form.

3

THE WITNESS:

4

BY MR. ISAACSON:

5

Q. So during this period of time, April 2019, 09:12:43

6

7

8

MR. FUNG: I'll object to the extent that

9

calls for privilege.

10

I caution the witness not to reveal any 09:12:57

11

contents of any privileged communication.

12

THE WITNESS:

13

14

BY MR. ISAACSON:

15

Q.

16

17

18

19

20

09:13:21

21

A. Yes.

22

Q. All right.

23

And do you --

24

25

09:13:27



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1 Q. All right.

2

3

4

5

6

7 MR. ISAACSON: All right. Can I have the  
8 next one? This would be 185.

9

10

(Tran Deposition Exhibit 185 was marked  
for identification.)

09:14:21

11

MR. ISAACSON: This is QX185.

12

BY MR. ISAACSON:

13

Q. All right.

14

15

QX185 is e-mail from Mr. Herbert -- I  
believe this is British style. It would be  
June 1st, 2019, since it follows the April 2019  
e-mail?

09:14:53

17

18

A. I don't remember this e-mail, so I  
can't --

19

20

Q. All right.

09:15:02

21

A. -- speculate.

22

23

Q. But just in terms of dating systems  
because your company -- because Arm is a UK company,  
do sometimes you get dates that follow the British  
format, where 01/06 in the U.S. would be

09:15:16

25

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1 All right. Do you recognize this as an  
2 e-mail that you would have received around June 1st,  
3 2019?

4 A. I don't remember the e-mail.

5 Q. All right. 09:16:51

6 And do you believe you did receive it  
7 around June 1st, 2019?

8 A. My name is on it, so, yes.

9 Q. Okay. The -- it makes reference to -- Tim  
10 Herbert says, [REDACTED] 09:17:08  
11 Who's Will Abbey?

12 A. He is our chief commercial officer.

13 Q. Okay. And do you know what his  
14 involvement was with the discussions with Nuvia?

15 A. No, I don't know. 09:17:23

16 Q. Okay. Gerard is Gerard Williams.  
17 Do -- do you know who John is?

18 A. No.

19 Q. Do you know who Manu is?

20 A. No. 09:17:34

21 Q. Okay. The -- and do you recognize the

22 [REDACTED]  
[REDACTED], Exhibit 184?

24 A. I don't remember it, but it looks like  
25 it's [REDACTED]. 09:17:58

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1 Q. All right.

2 Now, if you look at that attachment in  
3 185, and you look on the first page of the  
4 attachment, [REDACTED]

5 [REDACTED] 09:18:34

6 Do you see that?

7 A. Yes, I see it.

8 Q. Okay. [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 MR. FUNG: Objection as to form. Also

23 object to the extent it calls for privilege.

24 Caution the witness not to reveal the

25 contents of any privileged communication. 09:19:38

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1 THE WITNESS: I don't remember.

2 BY MR. ISAACSON:

3 Q. All right.

4 The -- [REDACTED]

■

■

■

■

9 Do you recall any communications with

10 Nuvia about that subject?

09:20:08

11 A. I don't remember.

12 Q. Do you -- to prepare for this deposition,

13 did you learn any facts about any communications

14 between Nuvia and Arm related to [REDACTED]

■

■

17 MR. FUNG: Objection. Form.

18 THE WITNESS: No.

19 BY MR. ISAACSON:

20 Q. All right.

09:20:42

21 [REDACTED]

■

■

■

■

09:21:02

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1 Do you see that?

2 A. Yes.

3 Q. Do you know what [REDACTED]

4 [REDACTED] refers to?

5 A. [REDACTED]

09:21:06

6 Q. Okay. [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 Do you see that? We went over that

10 language.

09:21:20

11 A. Yes, I see that.

12 Q. All right.

13 And do you know what that refers to?

14 A. [REDACTED]

15 [REDACTED]

09:21:31

16 Q. Okay. [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED] I didn't jot it

22 down.

23 A. [REDACTED]

24 [REDACTED] Thank you.

25 [REDACTED]

09:22:01

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1

2

A. Yes.

3

Q. Did you understand that at this period of

4

time, [REDACTED]

5

09:22:35

6

MR. FUNG: Objection. Form.

7

THE WITNESS: I don't remember.

8

BY MR. ISAACSON:

9

Q. Do you know whether [REDACTED]

10

11

12

A. I don't remember.

13

Q. [REDACTED]

14

15

[REDACTED]

Correct.

09:23:18

16

Q. [REDACTED]

17

18

[REDACTED]; is that correct?

19

MR. FUNG: Objection. Form.

20

THE WITNESS: It depends on the situation.

09:23:32

21

BY MR. ISAACSON:

22

Q. Were there [REDACTED]

23

24

[REDACTED] ?

25

A. I don't know.

09:23:46

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Page 46

1 Q. All right.

2

3

4

5 Do you see that?

09:24:12

6 A. Yes.

7 Q. Okay.

9 A. Yes.

10 Q. ? 09:24:24

11 MR. FUNG: Objection. Calls for  
12 privilege.

13 I caution the witness not to reveal the  
14 contents of any privileged communications. You can  
15 do so, you may respond [verbatim]. 09:24:33

16 THE WITNESS: I don't think I can answer  
17 that.

18 BY MR. ISAACSON:

19 Q. All right.

20 The -- when you say you can't answer that, 09:24:41  
21 is that because of your --

22 A. Because of privilege.

23 Q. The --

24 ?

25 A. I don't know. 09:24:58



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 47

1 Q. At any point, [REDACTED]  
[REDACTED] ?

3 A. No.

4 Q. Okay. [REDACTED]

[REDACTED] 09:25:12

6 A. I don't know. It's changed lawyers over  
7 time.

8 Q. Okay. [REDACTED]

[REDACTED]  
[REDACTED] 09:25:22

11 A. I don't remember.

12 Q. [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

23 A. I don't remember.

24 Q. Okay. And so, when you went to get -- [REDACTED]

[REDACTED] 09:26:10

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24

25

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]; is that correct?

MR. FUNG: Object to form of the question. 09:26:21

I also object as calling for privilege.

Caution the witness not to reveal the  
substance of any privileged communications.

THE WITNESS: That's correct.

BY MR. ISAACSON:

09:26:36

Q. Did you understand the [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

MR. FUNG: Objection. Form.

THE WITNESS: I don't remember, but

[REDACTED]

09:27:10

BY MR. ISAACSON:

Q. All right.

And to prepare yourself as a 30(b)(6)  
witness, did you talk to anyone about [REDACTED]

that provided you any facts that helped you

09:27:29

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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1

2

MR. FUNG: Objection as to form.

3

THE WITNESS: I spoke to counsel.

4

BY MR. ISAACSON:

5

Q. And did counsel help you understand -- did 09:27:38

6

counsel provide you any facts that helped you

7

understand

8

MR. FUNG: Caution the witness not to

9

reveal the contents of any privileged communication.

10

THE WITNESS: No.

09:27:52

11

BY MR. ISAACSON:

12

Q. Did you -- do you recall understanding

13

during the negotiations that

14

15

16

MR. FUNG: Objection. Form.

17

THE WITNESS: I don't remember.

18

BY MR. ISAACSON:

19

Q. Okay. Have you -- as part of your

20

preparation as a 30(b)(6) witness, have you learned 09:28:28

21

any facts about

22

23

A. No.

24

Q. All right. If we can flip to --

25

09:28:57

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1

All right. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

correct?

14

MR. FUNG: Objection. Form.

15

THE WITNESS: [REDACTED]

[REDACTED]

17

BY MR. ISAACSON:

18

Q. Yeah.

19

So they -- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

09:30:31

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1                   You have -- am I correct that [REDACTED]  
2                   [REDACTED]?

3                   MR. FUNG: Objection. Form.

4                   THE WITNESS: I don't remember this at  
5 all. 09:30:41

6 BY MR. ISAACSON:

7                   Q. The -- and to prepare as a 30(b)(6)  
8 witness, you have not attempted to learn any facts  
9 about [REDACTED]; is that  
10 correct? 09:30:49

11                   MR. FUNG: Objection. Form. Also object  
12 as calling for privilege.

13                   Caution the witness not to reveal the  
14 contents of any privileged communications.

15                   THE WITNESS: I have not. 09:31:00

16 BY MR. ISAACSON:

17                   Q. All right.

18                   Do you have any understanding that [REDACTED]  
19 [REDACTED]  
20 [REDACTED] [REDACTED]  
21 [REDACTED]

22                   MR. FUNG: Objection. Form.

23                   THE WITNESS: I don't remember.

24                   MR. ISAACSON: All right. Let's go to

25 June 15th. This will be -- I think this is 186. 09:31:38

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1 (Tran Deposition Exhibit 186 was marked  
2 for identification.)

3 THE COURT REPORTER: Your mic is still  
4 live, Counsel. Counsel, your mic is still live.  
5 Just -- yeah.

09:32:23

6 MR. ISAACSON: This would be 186.  
7 BY MR. ISAACSON:

8 Q. So Qual -- QX186 is Bates stamped  
9 ARM\_'26001. It includes attachments, and it runs  
10 through Bates stamp '58320. It has a cover e-mail  
11 from Tim Herbert, dated June 15th, 2019, to Gerard  
12 Williams. It's CC'd to Manu Gulati and John Bruno  
13 at Nuvia.

09:32:46

14 It says, [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

09:33:39

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1

[REDACTED]

2

You're not copied on this e-mail. Do you

3

recog- --

[REDACTED]

4

[REDACTED]

5

Do you see that?

09:33:57

6

A. I see it.

7

Q. All right.

8

[REDACTED];

9

correct?

10

MR. FUNG: Objection. Form.

09:34:03

11

THE WITNESS: Appears to be.

12

BY MR. ISAACSON:

13

Q. Okay. And so do you recognize the

14

documents that are attached [REDACTED]

15

[REDACTED]

[REDACTED]

16

[REDACTED]

17

[REDACTED]

18

[REDACTED]

19

MR. FUNG: Objection to form.

20

THE WITNESS: That's what it looks like.

09:34:38

21

BY MR. ISAACSON:

22

Q. The -- do you recall

[REDACTED]

23

[REDACTED]

24

[REDACTED]

25

MR. FUNG: Objection to form.

09:34:55

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1 THE WITNESS: I don't remember.

2 BY MR. ISAACSON:

3 Q. Okay.

4 The e-mail refers to [REDACTED]

[REDACTED]

[REDACTED]

7 A. No. I didn't write this e-mail.

8 Q. Do you recall working with a team on these  
9 documents?

10 A. I don't remember.

09:35:17

11 Q. All right.

12 He says, [REDACTED]

[REDACTED]

[REDACTED]

15 Do you know what discussions those are  
16 referring to?

09:35:28

17 A. No.

18 Q. It says, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23 A. I don't remember.

24 Q. Do you believe that that happened?

25 MR. FUNG: Objection to form.

09:35:50



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1 THE WITNESS: I don't remember.

2 BY MR. ISAACSON:

3 Q. All right.

4 If we can look at [REDACTED]

5 [REDACTED]

09:36:15

6 Do you see that?

7 A. Yes.

8 Q. It says, [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

09:36:48

16 A. I don't.

17 MR. FUNG: Objection. Form.

18 BY MR. ISAACSON:

19 Q. Okay. Do you have an understanding of

20 what it means today, [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

09:37:23

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1

[REDACTED]

2

[REDACTED]

3

[REDACTED]

4

[REDACTED]

5

[REDACTED]

09:37:40

6

MR. FUNG: Objection. Form.

7

THE WITNESS: I don't remember.

8

BY MR. ISAACSON:

9

Q. Okay. And as part of your efforts to

10

prepare as a 30(b)(c) -- (6) witness, am I correct

09:37:49

11

you've not learned any facts from anybody else that

12

would tell you [REDACTED]

13

[REDACTED]

14

[REDACTED]

15

MR. FUNG: Objection. Form.

09:38:04

16

THE WITNESS: No.

17

BY MR. ISAACSON:

18

Q. I did another double negative with you

19

there and -- so I got to stop doing that.

20

Well, let me -- actually, I'll repeat the

09:38:20

21

question and see if I can get the correct answer.

22

Am I correct that you have not learned any

23

facts as -- in your preparation as a 30(b)(6)

24

witness from anybody else that would tell you [REDACTED]

25

[REDACTED]

09:38:35

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1

2

3

MR. FUNG: Objection. Form.

4

BY MR. ISAACSON:

5

Q. Is that correct?

09:38:43

6

A. I have not learned any new facts.

7

Q. Thank you.

8

And you recall no discussions with anyone

9

at Nuvia about this comment; is that correct?

10

A. I don't recall.

09:38:59

11

Q. And you don't recall discussions about

12

this comment with anybody at Arm; is that correct?

13

MR. FUNG: Objection. Form.

14

Also caution the witness not to reveal

15

privileged communications.

09:39:10

16

THE WITNESS: I don't remember.

17

BY MR. ISAACSON:

18

Q. All right.

19

If you turn the page to

20

21

22

Do you see that?

23

A. Yes.

24

Q. All right.

25

09:39:35

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14

A. No, I don't remember.

15

Q. Do you have any understanding of what this 09:40:14

16

-- █

█

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09:40:43

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1 Q. Okay. The -- so what do you mean by [REDACTED]

[REDACTED]

[REDACTED]

4 MR. FUNG: Objection. Form.

5 THE WITNESS: [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

8 BY MR. ISAACSON:

9 Q. And what do you mean by [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

19 MR. FUNG: Objection to form.

20 THE WITNESS: Yes. 09:41:35

21 BY MR. ISAACSON:

22 Q. Okay. The Ar- -- [REDACTED]

[REDACTED]

[REDACTED]

25 MR. FUNG: Objection to form. 09:41:43

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Page 60

1 THE WITNESS: That's correct.

2 BY MR. ISAACSON:

3 Q. Okay. And the ArmARM, that manual does  
4 not tell CPU developers how to implement the  
5 architecture; is that correct?

09:41:57

6 MR. FUNG: Objection to form.

7 THE WITNESS: I have never read it.

8 BY MR. ISAACSON:

9 Q. You're not familiar with the ArmARM?

10 A. I know what it is, but I don't -- I don't 09:42:02  
11 know what's in the contents.

12 Q. All right.

13 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19 MR. FUNG: Objection. Form.

20 THE WITNESS: That's correct. 09:42:26

21 BY MR. ISAACSON:

22 Q. Okay. If we can -- if you turn to the  
23 next page, [REDACTED]

[REDACTED].

25 Do you see that? 09:42:37

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1 A. Yes.

2 Q. [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

[REDACTED]

6 [REDACTED]

7 MR. FUNG: Objection to form.

8 THE WITNESS: No.

9 BY MR. ISAACSON:

10 Q. Okay. All right.

09:43:09

11 [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

[REDACTED]

[REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

[REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

09:44:14

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Page 62

1

[REDACTED]

2

[REDACTED]

3

[REDACTED]; correct?

4

A. I don't remember.

5

Q. All right.

09:44:30

6

And you don't remember learning that --

7

[REDACTED]

8

[REDACTED]

9

[REDACTED]?

10

MR. FUNG: Objection. Form.

09:44:42

11

BY MR. ISAACSON:

12

Q.

[REDACTED]

13

[REDACTED]

14

[REDACTED]

15

[REDACTED]

09:44:51

16

A. I don't remember.

17

Q. And you don't remember learning --

18

learning anything about that from anybody at Arm;

19

correct?

20

MR. FUNG: Objection. Form.

09:44:58

21

THE WITNESS: I don't remember.

22

BY MR. ISAACSON:

23

Q. Okay. And you don't -- and you have not,

24

as a 30(b)(6) witness, tried to learn [REDACTED]

[REDACTED]

09:45:05



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1 [REDACTED]; correct?

2 MR. FUNG: Objection. Form. Also seeks  
3 privilege.

4 Caution the witness not to reveal the  
5 content of any privileged communications. 09:45:14

6 THE WITNESS: I'm sorry, can you repeat  
7 the question?

8 BY MR. ISAACSON:

9 Q. As a 30(b)(6) witness, you have not tried  
10 to learn any facts about [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 MR. FUNG: Same objections.

14 THE WITNESS: I --

15 MR. FUNG: Same caution to the witness. 09:45:30

16 THE WITNESS: I have not learned.

17 MR. ISAACSON: Okay.

18 THE COURT REPORTER: Can I ask everybody  
19 to slow down just a --

20 MR. ISAACSON: Sure. 09:45:38

21 THE COURT REPORTER: -- beat, please.

22 Thank you.

23 BY MR. ISAACSON:

24 Q. And then [REDACTED]

25 [REDACTED]

26 [REDACTED]

09:45:44

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12

A. I don't remember.

13

Q.

█

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█

19

MR. FUNG: Objection. Form.

20

THE WITNESS:

█

22

BY MR. ISAACSON:

23

Q. Okay.

█

█

09:47:21

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1 MR. FUNG: Objection to form.

2 BY MR. ISAACSON:

3 Q. -- is that correct?

4 A. No. [REDACTED]

5 [REDACTED] 09:47:30

6 Q. So they would re- -- they -- they would

7 re- -- [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED] 09:47:49

11 MR. FUNG: Objection. Form.

12 THE WITNESS: [REDACTED]

13 [REDACTED]

14 MR. ISAACSON: The -- all right.

15 So let me do June 17th, which is QX77. 09:48:00

16 THE WITNESS: Could we take a break --

17 MR. ISAACSON: Sure.

18 THE WITNESS: -- right now, please.

19 Thanks.

20 MR. ISAACSON: I forgot to say take a 09:48:11

21 break whenever you want.

22 THE WITNESS: Thank you.

23 THE VIDEOGRAPHER: Going off the record.

24 The time is 9:48.

25 (Short recess taken.) 09:48:20

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1 THE VIDEOGRAPHER: We're back on the  
2 record. The time is 10:02.

3 MR. ISAACSON: Thanks.

4 I'm giving you what's being marked as  
5 QX187, which is Bates stamped ARM\_58318 and '19. At 10:02:32  
6 the top it is an e-mail from Todd Lepinski to Tim  
7 Herbert on August 9th, 2019, on top of an e-mail  
8 from Gerard Williams to you, Mr. -- and Mr. Herbert  
9 on the subject of the [REDACTED]

10 THE COURT REPORTER: One second, Counsel. 10:03:01

11 THE WITNESS: Thank you.

12 BY MR. ISAACSON:

13 Q. Do you recognize the e-mail on -- that's  
14 in the middle of the first page that continues on to  
15 the next page on which you are copied on August 9th, 10:03:09  
16 '29 -- 2019 as an e-mail you would have received on  
17 or about that date?

18 A. I don't remember it.

19 Q. The -- it says, [REDACTED]

20 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

22 By the way, do you recall ever talking to  
23 Gerard Williams?

24 A. I don't remember.

25 Q. Do you remember ever meeting Gerard 10:03:46

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1 Williams?

2 A. I don't remember.

3 Q. Okay. Do you think if Gerard Williams  
4 walked in you would recognize him?

5 A. No.

10:03:59

6 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] correct?

12 A. I don't remember.

13 Q. The -- he says, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:04:56

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1

[REDACTED]

2

Let me know when you've had a chance to

3

read that paragraph.

4

A. (Witness reviews.)

5

I've read the paragraph.

10:05:25

6

Q. All right.

7

And so do you understand generally that

8

[REDACTED]

9

[REDACTED]

10

[REDACTED]

[REDACTED]

11

[REDACTED]

12

[REDACTED]

13

[REDACTED]

14

[REDACTED]

15

[REDACTED]

10:05:58

16

A. I don't remember.

17

Q. All right.

18

And then on the second page of the e-mail,

19

there's a Sec- -- [REDACTED].

20

Do you see that underneath his sig- --

10:06:27

21

underneath his - --

22

A. Yes.

23

Q. -- "Thanks, Gerard"?

24

Maybe you could take a look at that. Tell

25

me when you've read it.

10:06:36

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1 A. (Witness reviews.)

2 I've read it.

3 Q. All right.

4 [REDACTED]

5 [REDACTED] [REDACTED]

6 [REDACTED]

7 [REDACTED] [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 A. No.

15 Q. Okay. All right. 10:07:30

16 MR. ISAACSON: Can I have this one?

17 Oh, yes, it goes on. I'm sorry. Wait.

18 I've marked the wrong one here.

19 Can I look at your exhibit? I may have

20 given you the wrong Bates stamp number. 10:08:23

21 Yeah, yeah, I got to replace this, yes.

22 It's the same document, but it's more complete.

23 THE COURT REPORTER: Could we go off the

24 record?

25 MR. ISAACSON: We don't need to. 10:08:39

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1 THE COURT REPORTER: Okay.

2 MR. ISAACSON: I'm going to mark this as  
3 QX188.

4 MR. FUNG: Counsel, you're not withdrawing  
5 Exhibit 187? 10:08:54

6 MR. ISAACSON: No. There's -- there's  
7 no --

8 MR. FUNG: Okay.

9 MR. ISAACSON: -- no secret here. Just  
10 QX188 is a more complete version of the previous 10:08:59  
11 document.

12 (Tran Deposition Exhibit 188 was marked  
13 for identification.)

14 BY MR. ISAACSON:

15 Q. QX188 is Bates stamped ARM\_'25829 through 10:09:16  
16 '31. You'll see that it has in the middle of the  
17 paragraph the e-mail from Gerard Williams to  
18 Christine/Tim that we were looking at before.

19 A. Mm-hmm.

20 Q. All right. 10:09:39

21 [REDACTED]

[REDACTED]

23 A. I don't see anything.

24 Q. On 188?

25 A. (Indicating.) 10:10:00



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1 MR. BUTWIN: It should be in -- the other  
2 document.

3 THE WITNESS: I think it's in that one.

4 MR. ISAACSON: Oh. So -- oh, she gave it  
5 to me. Sorry. This is 188. 10:10:13

6 BY MR. ISAACSON:

7 Q. 188. So let me go -- you didn't have it  
8 in front of you, so let me --

9 A. So am I looking at --

10 Q. Do you have 188? 10:10:22

11 THE COURT REPORTER: One at a time.

12 THE WITNESS: I have 187 and 188.

13 BY MR. ISAACSON:

14 Q. All right.

15 I apologize. Oh, it's the other way 10:10:29  
16 around.

17 MR. BUTWIN: Yeah.

18 MR. ISAACSON: I see. I've confused this,  
19 so I apologize.

20 THE WITNESS: Thank you. 10:10:44

21 BY MR. ISAACSON:

22 Q. For the record, 187 is Bates stamped  
23 ARM\_'25829 through '31. And Arm 188 is '58318 and  
24 '19.

25 All right. 10:11:03

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 72

1

2

3

4

5

6

7

Q. All right.

8

Williams says in his e-mail to you on the

9

10

10:11:52

11

Do you see that?

12

A. Yes.

13

Q. And it says,

14

15

16

17

18

A. Per the e-mail, yes.

19

Q.

20

21

22

23

24

25

10:12:35

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 73

1 Do you see that?

2 A. I see that.

3 Q. Okay. [REDACTED]

[REDACTED]

[REDACTED]

10:12:49

6 MR. FUNG: Objection. Form.

7 THE WITNESS: [REDACTED]

[REDACTED]

9 BY MR. ISAACSON:

10 Q. Okay. All right.

10:12:59

11 And now if we look at 188, you'll see the  
12 e-mail was forwarded to Mr. Lepinski.

13 A. Yes, I see it.

14 Q. And Mr. Lepinski was Mr. Herbert's  
15 manager; is that correct?

10:13:22

16 A. At the time, yes.

17 Q. Okay. And he says, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

24 MR. FUNG: Objection. Form.

25 THE WITNESS: I don't remember.

10:13:51

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 74

1 BY MR. ISAACSON:

2 Q. Do you remember [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 MR. FUNG: Objection. Form.

10:14:05

6 THE WITNESS: I don't remember.

7 BY MR. ISAACSON:

8 Q. Okay. All right.

9 MR. ISAACSON: Now let's do August 27th.

10 This will be 189, QX189.

10:14:37

11 (Tran Deposition Exhibit 189 was marked  
12 for identification.)

13 BY MR. ISAACSON:

14 Q. All right.

15 Exhibit 189 is Bates stamped ARM\_'25854

10:15:25

16 with an attachment that runs through '5872. It's an  
17 e-mail August 27, 2019, from Tim Herbert to Gerard  
18 Williams, copied to you, on the subject of the

19 [REDACTED]

20 Do you agree that this is an e-mail you  
21 would have received on or about this date,  
22 August 27th, 2019?

10:15:56

23 A. My name is on there; so, yes.

24 Q. It says, [REDACTED]

[REDACTED]

10:16:10

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 75

1

2

3

A. No, I don't remember.

4

Q. Okay. It says, [REDACTED]

5

6

7

8

9

A. I don't remember.

10

Q. Do you know -- [REDACTED]

11

12

13

A. I don't remember.

14

Q. Okay. Do you know who "David" refers to?

15

A. No.

10:16:52

16

Q. [REDACTED]

17

18

19

A. Probably.

20

Q. Okay. [REDACTED]

21

22

23

A. Probably.

24

Q. Do you recall doing those edits?

25

A. I don't remember.

10:17:40

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 76

1 Q. All right.

2 [REDACTED]

3 [REDACTED] [REDACTED]

4 [REDACTED]

5 A. Yes.

10:18:03

6 Q. All right.

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED] [REDACTED]

14 [REDACTED]

15 [REDACTED] [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 A. Looks like it.

10:18:57

21 Q. Okay. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

10:19:29

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 77

1

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█

█

█

█

█

█

10

A. Looks like it.

10:20:01

11

Q.

█

█

14

MR. FUNG: Objection. Form.

15

THE WITNESS:

█

█

18

BY MR. ISAACSON:

19

Q. All right.

█

█

█

█

█

█

10:20:59

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 78

1

[REDACTED]

2

[REDACTED]

3

[REDACTED]

4

MR. FUNG: Objection. Form.

5

THE WITNESS: I [REDACTED] [REDACTED]

6

[REDACTED]

7

BY MR. ISAACSON:

8

Q. Okay. [REDACTED]

9

[REDACTED]

10

[REDACTED] [REDACTED]

11

[REDACTED]

12

[REDACTED]

13

[REDACTED]

14

[REDACTED]

15

[REDACTED] [REDACTED] [REDACTED]

16

[REDACTED]

17

[REDACTED]

18

[REDACTED]

19

MR. FUNG: Objection. Form.

20

THE WITNESS: [REDACTED] [REDACTED]

21

[REDACTED]

22

BY MR. ISAACSON:

23

Q. All right.

24

[REDACTED]

25

A. I don't know. [REDACTED] 10:22:35



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 79

1 [REDACTED] --

2 Q. Okay.

3 A. -- [REDACTED]

4 [REDACTED]

5 Q. All right.

10:22:42

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 Do you see that?

10 A. Yes.

10:23:26

11 Q. It says, [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED]

[REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED] [As written]

19 [REDACTED]

20 [REDACTED]

[REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 Q. Okay. And would you give me an example

10:24:20

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 80

1

[REDACTED]

2

[REDACTED]

3

[REDACTED]

[REDACTED]

4

[REDACTED]

[REDACTED]

5

[REDACTED]

10:24:36

6

A. Yes.

7

Q. Okay.

[REDACTED]

8

[REDACTED]

9

[REDACTED]

10

[REDACTED] [REDACTED]

[REDACTED]

11

[REDACTED]

12

[REDACTED]

13

[REDACTED]

[REDACTED]

14

[REDACTED] [REDACTED]

15

[REDACTED]

[REDACTED]

16

[REDACTED]

17

[REDACTED] [REDACTED]

18

[REDACTED]

19

[REDACTED]

20

[REDACTED]

10:25:24

21

Q. Okay.

[REDACTED]

22

[REDACTED]

23

[REDACTED]

24

[REDACTED]

25

A. Yes.

10:25:38

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 81

1

Q. Okay. [REDACTED]

2

3

4

5

10:26:00

6

MR. FUNG: Objection. Form.

7

THE WITNESS: [REDACTED]

8

9

10

10:26:14

11

BY MR. ISAACSON:

12

Q. [REDACTED]

13

14

15

10:26:25

16

A. Yes.

17

MR. ISAACSON: All right. September 27th.

18

This is 190 now?

19

MR. BUTWIN: Yeah.

20

MR. ISAACSON: All right. This will be

10:26:55

21

1- -- QX190.

22

(Tran Deposition Exhibit 190 was marked

23

for identification.)

24

BY MR. ISAACSON:

25

Q. All right.

10:27:23

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 82

1           The QX190 is dated -- well, first of all,  
2           it's Bates stamped ARM\_'2913 and with the  
3           attachment, runs through '2987.

4           This is an -- it has a cover e-mail from  
5           you, dated September 27th, 2019, to Gerard Williams      10:27:47  
6           copying Mr. Herbert and Mr. Brittain about the Nuvia  
7           Arm agreements. It says, [REDACTED]

8           [REDACTED]

9           [REDACTED]

10          [REDACTED]      [REDACTED]      [REDACTED]      [REDACTED]

11          [REDACTED]

12          [REDACTED]

13          [REDACTED]

14          [REDACTED]      [REDACTED]

15          [REDACTED]

16          [REDACTED]

17           A.    No.

18           Q.    All right.

19          [REDACTED]

20          [REDACTED]

21          [REDACTED] ?

22           A.    That's what it looks like.

23           Q.    Okay. [REDACTED]

24          [REDACTED]

25          [REDACTED]

10:29:15

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 83

1 A. Yes.

2 Q. Okay. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:29:44

11 A. No. I don't remember.

12 Q. Okay. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 A. I don't remember.

18 Q. Okay. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

24 MR. FUNG: Objection. Form.

25 THE WITNESS: I did not learn anything.

10:30:37

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 84

1 BY MR. ISAACSON:

2 Q. [REDACTED]

3 [REDACTED] --

4 A. Yes.

5 Q. -- do you see it?

10:31:15

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 THE COURT REPORTER: Could you slow down a

14 little bit.

15 MR. ISAACSON: Sure.

16 BY MR. ISAACSON:

17 Q. -- [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED] [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 MR. FUNG: Objection. Form.

10:31:52

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 85

1 THE WITNESS: No.

2 BY MR. ISAACSON:

3 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 A. No.

8 Q. Okay. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 MR. FUNG: Objection. Form.

13 THE WITNESS: I don't remember.

14 BY MR. ISAACSON:

15 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20 MR. FUNG: Objection.

10:32:52

21 BY MR. ISAACSON:

22 Q. -- [REDACTED]

23 MR. FUNG: Objection. Form.

24 THE WITNESS: I don't remember.

25 BY MR. ISAACSON:

10:32:58

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 86

1

Q. [REDACTED]

2

3

4

MR. FUNG: Objection. Form.

5

THE WITNESS: No.

10:33:23

6

BY MR. ISAACSON:

7

Q. All right.

8

9

10

11

Do you see that?

12

A. Yes, I see it.

13

Q. All right.

14

15

16

17

18

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24

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10:34:52



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 87

1 A. Yes.

2 Q. All right.

3

█

█

█

7 MR. FUNG: Objection. Form.

8 THE WITNESS: I did not have any

9 communications.

10 BY MR. ISAACSON:

10:35:17

11 Q. Right.

█

█

█

15 When did that happen?

10:35:31

16 A. That was yesterday.

17 Q. Okay. And how long was your preparation?

18 A. From 9:00 a.m. to 4:30 p.m.

19 Q. Okay. And that's -- that's the only time

20 you've spent preparing for the deposition, was the

10:35:47

21 time you spent yesterday?

22 A. Yes.

23 Q. Okay. Other than the -- any

24 communications you had yesterday preparing for this

25 deposition, have you ever had communications with

10:35:59

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 88

1

[REDACTED]

2

[REDACTED]

3

[REDACTED]

4

[REDACTED]

5

MR. FUNG: Object to the form. Also

10:36:16

6

object as calling for privilege.

7

Caution the witness not to reveal the

8

contents of any privileged communications.

9

THE WITNESS:

[REDACTED]

10

[REDACTED]

[REDACTED]

11

[REDACTED]

12

BY MR. ISAACSON:

13

Q.

[REDACTED]

14

[REDACTED]

15

A. Yes.

10:36:32

16

Q. Okay.

[REDACTED]

17

[REDACTED]

18

[REDACTED]

19

[REDACTED]?

20

MR. FUNG: Objection as to privilege.

10:36:49

21

Caution the witness not to reveal the

22

contents of any privileged communications.

23

THE WITNESS:

[REDACTED]

24

[REDACTED]

25

BY MR. ISAACSON:

10:36:58

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 89

1

Q. Okay. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:37:34

16

BY MR. ISAACSON:

17

Q. [REDACTED]

[REDACTED]

19

MR. FUNG: Objection. Form.

20

THE WITNESS: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:38:12

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 90

1

2

3

BY MR. ISAACSON:

4

Q. All right.

5

6

7

8

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10:39:35

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 91

1 A. I don't remember.

2 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:41:13

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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1

[REDACTED]

25

MR. FUNG: I caution the witness not to

10:42:28

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 93

1 reveal the contents of any privileged  
2 communications.

3 THE WITNESS: I don't remember.

4 BY MR. ISAACSON:

5 Q. All right. 10:43:17

6 [REDACTED]  
[REDACTED]  
[REDACTED]

9 A. I see it.

10 Q. All right. 10:44:05

11 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

17 MR. FUNG: Object- -- go ahead.

18 Objection. Form.

19 MR. ISAACSON: Did I read it wrong?

20 MR. FUNG: You're omitting our response to 10:44:31  
21 the topic, so...

22 MR. ISAACSON: Oh, I'm just saying that's  
23 the topic.

24 MR. FUNG: Okay.

25 THE WITNESS: Yes, I see it there. 10:44:35

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 94

1 BY MR. ISAACSON:

2 Q. The -- that was a topic in which you  
3 prepared for for this deposition; is that right?

4 MR. FUNG: Objection. Form.

5 THE WITNESS: Yes.

10:44:46

6 BY MR. ISAACSON:

7 Q. Okay. [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 MR. FUNG: Objection. Form.

10:45:00

11 THE WITNESS: Yes.

12 BY MR. ISAACSON:

13 Q. [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 MR. FUNG: I'll object as calling for

10:45:30

21 privilege.

22 Caution the witness not to reveal the

23 contents of any privileged communications.

24 THE WITNESS: [REDACTED]

25 [REDACTED]

[REDACTED]:42



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 95

1 BY MR. ISAACSON:

2 Q. [REDACTED]

[REDACTED]

[REDACTED]

5 MR. FUNG: Objection. Form.

10:45:53

6 THE WITNESS: Yes.

7 BY MR. ISAACSON:

8 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19 MR. FUNG: Objection. Form.

20 THE WITNESS: Yes.

10:46:53

21 BY MR. ISAACSON:

22 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

? 10:47:11

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 96

1 MR. FUNG: Objection. Form.

2 Also caution the witness not to reveal the  
3 contents of any privileged communications.

4 THE WITNESS: [REDACTED]

5 [REDACTED] 10:47:27

6 BY MR. ISAACSON:

7 Q. [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 MR. FUNG: Objection. Form.

10:47:44

11 Also caution the witness not to reveal the  
12 contents of any privileged communications.

13 THE WITNESS: [REDACTED]

14 [REDACTED]

15 [REDACTED]:

10:47:57

16 Q. [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

[REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

10:48:50

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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2

3

MR. FUNG: Objection. Form.

4

THE WITNESS:

5

6

7

8

9

MR. FUNG: Objection. Form.

10

THE WITNESS:

11

12

13

14

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19

20

MR. FUNG: Objection. Form.

10:49:34

21

THE WITNESS:

22

23

24

25

10:49:43

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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1

2

3

MR. FUNG: Objection to form.

4

THE WITNESS:

5

6

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18

MR. FUNG: Objection. Form.

19

THE WITNESS:

20

21

22

23

24

25

10:51:04

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Page 99

1

[REDACTED]

2

MR. FUNG: Objection to form.

3

BY MR. ISAACSON:

4

Q.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9

MR. FUNG: Objection. Form.

10

THE WITNESS:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:51:41

21

MR. FUNG: Objection to form.

22

THE WITNESS:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:51:55

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 100

1

[REDACTED]

2

BY MR. ISAACSON:

3

Q.

[REDACTED]

4

[REDACTED]

5

[REDACTED]

[REDACTED]

6

[REDACTED]

7

MR. FUNG: Objection. Form.

8

THE WITNESS:

[REDACTED]

9

[REDACTED]

10

[REDACTED]

[REDACTED]

11

[REDACTED]

12

[REDACTED]

13

[REDACTED]

[REDACTED]

14

[REDACTED]

15

[REDACTED]

[REDACTED]

16

[REDACTED]

17

[REDACTED]

18

[REDACTED]

19

[REDACTED]

20

MR. FUNG: Objection to form.

10:52:53

21

THE WITNESS:

[REDACTED]

22

[REDACTED]

23

[REDACTED]

24

[REDACTED]

[REDACTED]

25

[REDACTED]

10:53:12

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 101

1

2

3

4

5

10:53:24

6

MR. FUNG: Objection --

7

BY MR. ISAACSON:

8

Q.

9

10

11

12

13

14

15

16

17

18

MR. FUNG: Objection. Form. Asked and

19

answered.

20

THE WITNESS:

21

22

23

24

25

10:54:07

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 102

1 MR. FUNG: Objection to form.

2 THE WITNESS: [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 BY MR. ISAACSON:

10:54:24

6 Q. [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 Do you see that?

10:54:49

11 A. Yes.

12 Q. Okay. [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

[REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

10:55:20

21 Q. All right.

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 A. I don't remember.

10:55:28



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 103

1 MR. FUNG: Objection to form.

2 BY MR. ISAACSON:

3 Q. Okay. [REDACTED]

4 [REDACTED]

5 [REDACTED] correct?

10:55:40

6 MR. FUNG: Objection. Form.

7 Also caution the witness not to reveal  
8 privileged communications.

9 THE WITNESS: [REDACTED]

10 [REDACTED]

10:55:51

11 BY MR. ISAACSON:

12 Q. Okay. [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 MR. FUNG: Same caution as to --

10:56:04

16 BY MR. ISAACSON:

17 Q. [REDACTED]

18 [REDACTED]

19 MR. FUNG: Objection as to privilege.

20 Caution the witness not to reveal the  
21 contents of any privileged communications.

10:56:12

22 THE WITNESS: [REDACTED]

23 BY MR. ISAACSON:

24 Q. [REDACTED] [REDACTED]

25 [REDACTED]

10:56:45

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Page 104

1

[REDACTED]

2

[REDACTED]

3

[REDACTED]

4

[REDACTED]

5

MR. FUNG: Objection to form.

10:57:43

6

THE WITNESS:

[REDACTED]

7

BY MR. ISAACSON:

8

Q.

[REDACTED]

9

[REDACTED]

10

[REDACTED]

[REDACTED]

11

[REDACTED]

12

[REDACTED]

13

[REDACTED]

14

MR. FUNG: Objection. Form.

15

THE WITNESS: Yes.

10:58:22

16

BY MR. ISAACSON:

17

Q.

[REDACTED]

18

[REDACTED]

19

[REDACTED]

20

[REDACTED]

[REDACTED]

21

[REDACTED]

22

MR. FUNG: Objection. Form.

23

THE WITNESS:

[REDACTED]

24

[REDACTED]

25

[REDACTED]

10:59:42

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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1

2

3

BY MR. ISAACSON:

4

Q.

5

6

7

8

9

10

MR. FUNG: Objection to form.

11:00:25

11

THE WITNESS: Yes.

12

BY MR. ISAACSON:

13

Q.

14

15

16

17

18

19

20

MR. FUNG: Objection as to privilege.

11:00:55

21

22

Caution the witness not to reveal the  
contents of any privileged communications.

23

THE WITNESS: I don't remember.

24

BY MR. ISAACSON:

25

Q.

11:01:04

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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2

3

MR. FUNG: Objection to form.

4

THE WITNESS: Yes.

5

BY MR. ISAACSON:

11:01:15

6

Q.

7

8

9

MR. FUNG: Objection to form.

10

THE WITNESS: Yes.

11:01:28

11

BY MR. ISAACSON:

12

Q.

13

14

15

16

17

18

19

MR. FUNG: Objection. Form.

20

THE WITNESS:

21

22

23

24

25

BY MR. ISAACSON:

11:02:18

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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11

MR. FUNG: Objection to form.

12

THE WITNESS:

█

█

█

█

17

BY MR. ISAACSON:

18

Q.

█

█

█

█

23

MR. FUNG: Objection. Form.

24

THE WITNESS:

█

11:02:48

11:03:29

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 108

1 BY MR. ISAACSON:

2 Q. All right.

3

■

5 MR. FUNG: Objection to form.

11:03:41

6 THE WITNESS: Yes.

7 BY MR. ISAACSON:

8 Q. ■

■

■

11 A. I don't know.

12 MR. ISAACSON: Is this a good time for a  
13 break?

14 THE VIDEOGRAPHER: We're going off the  
15 record. The time is 11:04.

11:04:24

16 (Short recess taken.)

17 THE VIDEOGRAPHER: We're back on the  
18 record. The time is 11:21.

19 BY MR. ISAACSON:

20 Q. ■

■

■

■

■

■

11:21:52

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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1

2

3

4

MR. FUNG: Objection. Form.

5

THE WITNESS: Yes.

11:22:06

6

BY MR. ISAACSON:

7

Q.

8

9

10

11

12

MR. FUNG: Objection to form.

13

THE WITNESS: I can't speculate.

14

BY MR. ISAACSON:

15

Q.

16

17

18

19

20

11:23:35

21

A. Yes.

22

Q.

23

24

25

A. That's correct.

11:23:49

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 110

1

Q. Okay.

█

█

█

█

█

█

█

█

█

█

█

█

14

Q. All right.

15

A. -- attached with that.

11:24:29

16

Q.

█

█

19

MR. FUNG: Objection to form.

20

THE WITNESS: Yes.

11:24:38

21

BY MR. ISAACSON:

22

Q. All right.

23

The -- and are you familiar with the Arm

24

ISA, the instruction set architecture?

25

MR. FUNG: Objection to form.

11:25:00



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 111

1 THE WITNESS: What do you mean by  
2 "familiar"?

3 BY MR. ISAACSON:

4 Q. Have you looked at it before?

5 A. No.

11:25:08

6 Q. All right.

7 The -- do you have an understanding of  
8 what it is?

9 A. [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 A. To have --

18 MR. FUNG: Object to -- sorry.

19 THE WITNESS: I'm sorry.

20 MR. FUNG: I'll object to form. Also

11:25:46

21 object to this line of questioning as outside the  
22 scope of the 30(b)(6) topics by which she's  
23 designated.

24 Per the parties agreement, I am not going

25 to object every single time when I think something

11:25:54

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 112

1 is out of scope. And per our agreement, we can  
2 resolve objections later, after the deposition.

3 THE WITNESS: [REDACTED]

4 [REDACTED]  
5 BY MR. ISAACSON:

11:26:16

6 Q. And the Arm ISA can also be found on Arm's  
7 website?

8 MR. FUNG: Objection. Form.

9 THE WITNESS: I don't know.

10 BY MR. ISAACSON:

11:26:25

11 Q. And -- all right.

12 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19 A. No.

20 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:27:54

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 113

1 A. No.

2 Q. Okay. [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 A. No.

11:28:07

6 MR. ISAACSON: All right. [REDACTED]

7 [REDACTED] [REDACTED]

8 [REDACTED] -- or -- I mean -- I'm sorry, no. Yeah. I'm  
9 sorry, yeah. Just -- okay.

10 All right. Give me the agreement, too, I  
11 guess.

11:28:39

12 And we're on 191 and 192; is that right?

13 MR. BUTWIN: That sounds right.

14 MR. ISAACSON: Yeah. All right.

15 So I'll mark as 191 the ALA with Qualcomm  
16 and as 192 Annex 1.

11:29:21

17 (Tran Deposition Exhibit 191 was marked  
18 for identification.)

19 (Tran Deposition Exhibit 192 was marked  
20 for identification.)

11:30:05

21 BY MR. ISAACSON:

22 Q. All right.

23 Do you recognize 191, which is, as the --

24 [REDACTED]

[REDACTED]

11:30:15

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 114

1 A. Yes.

2 Q. And do you recognize Exhibit 192 as [REDACTED]

3 [REDACTED]

4 A. Yes.

5 Q. All right. 11:30:32

6 And looking at 192, the annex, [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 MR. FUNG: Objection to form. 11:30:58

11 THE WITNESS: It appears to be.

12 BY MR. ISAACSON:

13 Q. [REDACTED]

14 [REDACTED]

15 [REDACTED]

[REDACTED]

16 [REDACTED]

17 [REDACTED]

18 A. Yes.

19 Q. Okay. [REDACTED]

20 [REDACTED]

[REDACTED]

21 [REDACTED]

22 A. Yes.

23 Q. It says, [REDACTED]

24 [REDACTED]

25 [REDACTED]

11:31:49

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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1

[REDACTED]

2

A. Yes.

3

Q. Okay.

[REDACTED]

4

[REDACTED]

5

[REDACTED]

11:32:07

6

MR. FUNG: Objection to form.

7

THE WITNESS: I don't know.

[REDACTED]

8

[REDACTED]

9

BY MR. ISAACSON:

10

Q. All right.

11:32:15

11

[REDACTED]

12

[REDACTED]

13

[REDACTED]

14

[REDACTED]

15

MR. FUNG: Objection. Form.

11:32:27

16

Also caution the witness not to reveal the

17

contents of any privileged communications.

18

THE WITNESS: I don't know.

19

BY MR. ISAACSON:

20

Q. All right.

11:32:34

21

[REDACTED]

22

[REDACTED]

23

[REDACTED]

24

[REDACTED]

25

[REDACTED]

11:32:51

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 116

1 A. I don't know.

2 MR. ISAACSON: All right. I need this  
3 one.

4 All right. This will be 193.

5 (Tran Deposition Exhibit 193 was marked 11:33:51  
6 for identification.)

7 BY MR. ISAACSON:

8 Q. All right.

9 The -- 193 is Bates stamped ARM\_'2098,  
10 along with its attachment, through '2131. It's an 11:34:33  
11 e-mail dated June 16th, 2020, from Brett Bettsworth  
12 at Qualcomm to Lynn -- how do you say her last name?

13 A. Couillard.

14 Q. -- Couillard -- thank you -- and to you  
15 and some other individuals. 11:34:56

16 [REDACTED]

17 [REDACTED].

18 Do I have that right?

19 A. That's what it appears to be.

20 Q. Okay. And it says, [REDACTED] [REDACTED]

21 [REDACTED]

22 [REDACTED] [As

23 read]

24 [REDACTED]

[REDACTED] 11:35:22

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 117

1 [REDACTED] ?

2 A. I don't remember, but my name is on here,  
3 so...

4 Q. All right.

5 [REDACTED] [REDACTED]  
6 [REDACTED] .

7 A. I see that.

8 Q. Okay. And Lynn Couillard, is she the vice  
9 president of sales?

10 A. Yes, for the North America region. 11:35:51

11 Q. And she has been at Arm for at least five  
12 years; is that right?

13 A. Sounds about right, yeah.

14 Q. Okay. [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED]

18 Q. All right.

19 [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 A. I see it.

23 Q. Okay. It -- she says, [REDACTED]

24 [REDACTED]

25 [REDACTED] [REDACTED] 11:36:55

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 118

1

2

3

4

5

6

7

Is that -- do I have that right?

8

A. Yes.

9

Q. Okay.

10

11:37:21

11

Is that -- that's what's going on here?

12

A. It appears to be.

13

Q. All right.

14

15

16

17

18

19

MR. FUNG: Objection to form.

20

BY MR. ISAACSON:

11:37:43

21

Q. Do I have that right?

22

A. That is what her comment says.

23

Q. All right. Here's another name that I may

24

mispronounce.

25

Richard Grisenthwaite?

11:38:00



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 119

1 A. That's correct.

2 Q. Thank you.

3 He's the executive vice president and  
4 chief architect for Arm; is that right?

5 A. Yes.

11:38:13

6 Q. I have that he started at Arm in 1996.  
7 Does that sound right?

8 A. I don't know.

9 Q. But a long -- he's been at Arm a long  
10 time?

11:38:20

11 A. Yes.

12 Q. Okay. And he's the chief architect for  
13 Arm architecture?

14 A. Yes.

15 Q. He'd be the highest ranking officer at Arm  
16 responsible for that Arm architecture; is that  
17 right?

11:38:25

18 MR. FUNG: Objection. Form.

19 THE WITNESS: I think the CEO would be.

20 BY MR. ISAACSON:

11:38:36

21 Q. Okay. Is he primarily responsible for the  
22 changes that are made to the Arm architecture; that  
23 is Mr. Grisenthwaite, not the CEO?

24 MR. FUNG: Objection to form.

25 THE WITNESS: I don't know.

11:38:50

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 120

1 BY MR. ISAACSON:

2 Q. Okay. [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

11:38:58

6 A. I don't know.

7 Q. [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 MR. FUNG: I'll object as outside the

11:39:14

11 scope of the 30(b)(6).

12 THE WITNESS: I don't know.

13 MR. ISAACSON: All right. Let's do this.

14 This has previously been marked as QX76.

15 And I'll just give this right to you.

11:39:49

16 (Previously marked Deposition Exhibit QX76  
17 was referenced.)

18 MR. ISAACSON: And QX76 is Bates stamped

19 ARM\_ '25088 to '25091.

20 BY MR. ISAACSON:

11:40:00

21 Q. The -- on the first page there's a top  
22 e-mail forward from Mr. Grisenthwaite to Gerard  
23 Williams and Matthew Gretton-Dann, if I'm  
24 pronouncing his right.

25 Do you know who he -- Matthew Gretton-Dann

11:40:33

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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1 is?

2 A. No.

3 Q. Okay. The -- if you turn to '25089,

4 Mr. -- at the bottom, Mr. Grisenthwaite is writing

5 on March 7th, 2019, [REDACTED] [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 MR. FUNG: Objection to form. Also object 11:41:00

11 as outside the scope of the 30(b)(6).

12 The witness may answer in her personal

13 capacity.

14 THE WITNESS: I was not aware.

15 BY MR. ISAACSON:

11:41:10

16 Q. Okay. The -- he says, [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 Q. Okay. He says, [REDACTED]

25 [REDACTED]

11:41:35

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 122

1 [REDACTED] [As written]

2 So who is Simon?

3 A. I think he means Simon Segars, our CEO at  
4 the time.

5 Q. [REDACTED] [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 MR. FUNG: Objection. Form.

9 THE WITNESS: [REDACTED]

10 [REDACTED] ?

11:42:09

11 BY MR. ISAACSON:

12 Q. Yeah.

13 A. I believe so.

14 Q. Okay. [REDACTED]

15 [REDACTED] ?

11:42:14

16 A. No.

17 Q. Okay. And moving to the next page,

18 there's a -- [REDACTED]

19 [REDACTED]

20 [REDACTED]

11:42:35

21 Do you see that?

22 A. Yes.

23 Q. It says, [REDACTED] [REDACTED]

24 [REDACTED]

25 [REDACTED]

11:42:52

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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1

[REDACTED]

2

[REDACTED] [REDACTED]

3

So was that a true statement at the time?

4

MR. FUNG: Objection. Form.

5

THE WITNESS: I don't know. There's

11:43:12

6

portions of the ArmARM that are on our website.

7

BY MR. ISAACSON:

8

Q. All right.

9

And then it says, [REDACTED]

10

[REDACTED]

[REDACTED]

11

[REDACTED] [REDACTED]

12

[REDACTED]

13

[REDACTED]

14

MR. FUNG: Objection. Form.

15

THE WITNESS: [REDACTED]

[REDACTED]

16

[REDACTED]

17

BY MR. ISAACSON:

18

Q. He goes on to say, [REDACTED]

19

[REDACTED]

20

[REDACTED]

[REDACTED]

21

[REDACTED]

22

[REDACTED] [REDACTED]

23

[REDACTED] [REDACTED]

24

[REDACTED]

25

MR. FUNG: Objection. Form.

11:44:03

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 124

1 THE WITNESS: I don't have any knowledge  
2 on that.

3 BY MR. ISAACSON:

4 Q. All right.

5 Moving to the first page of the e-mail -- 11:44:12  
6 of the chain, he said -- Mr. Grisenthwaite says at  
7 the top to Mr. Williams, [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11:44:37

11 A. It looks like it.

12 Q. Okay. [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

11:44:49

16 Q. All right.

17 The -- and then moving down, on

18 March 18th, 2019, it says, [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

11:45:21

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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1 A. I'm not sure. [REDACTED].

2 Q. And developer.arm.com would be the website  
3 where these materials would be available that he's  
4 referring to?

5 A. That is the Arm site where things are 11:45:36  
6 publicly available.

7 Q. Right. And I take it that you had no  
8 knowledge that Mr. Grisenthwaite was telling Gerard  
9 Williams, copying Matthew Gretton-Dann, [REDACTED]

[REDACTED] 11:45:51

11 MR. FUNG: Objection. Form.

12 THE WITNESS: No. I don't have any  
13 knowledge of that.

14 BY MR. ISAACSON:

15 Q. Okay. And did I ask you who Matthew 11:45:57  
16 Gretton-Dann is? Who's Matthew Gretton-Dann?

17 A. I don't know who he is.

18 Q. Maybe that's why I didn't remember.

19 [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

22 A. [REDACTED]

23 Q. Okay. All right.

24 MR. ISAACSON: Can I have the June 17th?

25 BY MR. ISAACSON: 11:46:41

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 126

1 Q. Based on what you understand to be  
2 Mr. Grisenthwaite's responsibilities at Arm, would  
3 you have an understanding as to [REDACTED]

4 [REDACTED]

5 MR. FUNG: Objection. Form. 11:46:56

6 THE WITNESS: I can't speculate.

7 BY MR. ISAACSON:

8 Q. [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED] [REDACTED]

14 [REDACTED]

15 [REDACTED] [REDACTED]:22

16 MR. FUNG: Objection. Form.

17 THE WITNESS: [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 MR. ISAACSON: All right. So this will be 11:47:42

21 194 -- oh, wait, no, it's already marked. Okay.

22 6/17.

23 All right. This has been previously

24 marked as QX77.

25 (Previously marked Deposition Exhibit QX77 11:47:58



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1 was referenced.)

2 This is 76, I don't know if you wanted  
3 another copy of it.

4 THE WITNESS: Yeah, I have a second copy  
5 of it.

11:48:06

6 MR. ISAACSON: Oh, okay. Here's 77.

7 BY MR. ISAACSON:

8 Q. Okay. QX77 is Bates stamped ARM\_'80859  
9 through '61.

10 This is an e-mail from Dermot O'Driscoll  
11 at Arm on June 17th, 2019, to Mr. Grisenthwaite,  
12 Drew Henry, Tim Herbert, copied to Mohamed Awad, [REDACTED]

11:48:25

[REDACTED]

[REDACTED]

[REDACTED]

11:48:50

16 A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

25 Q. And who's Drew Henry?

11:49:37

Page 128

4 Q. Would he have been a lower title strategy  
5 officer at this part -- in time?

6 MR. FUNG: Objection. Form.

9 BY MR. ISAACSON:

16 Q. And -- and who is Mohamed Awad?

20 Q. Was he in the infrastructure business  
21 then?

22	A. Yes.
----	---------

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 129

1

2

3

A. It looks like it.

4

Q.

5

6

7

8

9

MR. FUNG: Objection. Form.

10

THE WITNESS: I don't remember, but yes,

11:51:26

11

that would be a fair assessment.

12

BY MR. ISAACSON:

13

Q. The -- and -- I don't know these titles.

14

The -- I think at this time, you were the managing

15

counsel in the legal department --

11:51:49

16

A. Yeah.

17

Q. -- correct?

18

A. Yes.

19

Q. Right. And so, these would be people in

20

the business side who you would report to if you

11:51:59

21

were working with them?

22

MR. FUNG: Objection. Form.

23

THE WITNESS: I would work with them, but

24

I don't report to them.

25

BY MR. ISAACSON:

11:52:09

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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1 Q. Okay. The -- all right. All right.

2 At the bottom of first -- the first page,

3 Drew Henry wrote on June 17th, 2019.

4 Do you see that?

5 A. Yes.

11:52:33

6 Q. He says, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

22 MR. FUNG: Objection. Form.

23 BY MR. ISAACSON:

24 Q. Am I correct about that?

25 A. I was not aware of these discussions.

11:53:19

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 131

1 Q. All right.

2 And going to the second and third page on  
3 June 17th, at the bottom, Mr. Grisenthwaite writes  
4 to Drew Henry, Mohamed Awad and Tim Herbert [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 MR. FUNG: Objection.

13 BY MR. ISAACSON:

14 Q. Am I correct about that?

15 MR. FUNG: Objection. Form. 11:54:22

16 THE WITNESS: I'm not aware of these  
17 discussions.

18 BY MR. ISAACSON:

19 Q. [REDACTED]

[REDACTED]

[REDACTED]

22 MR. FUNG: Objection. Form. Also,  
23 outside the scope of the 30(b)(6) topics.

24 THE WITNESS: I'm not aware that any  
25 copyrights have expired. 11:55:08

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 132

1 BY MR. ISAACSON:

2 Q. And then if we can go back to the signed  
3 agreement, which was 189, and if we can look at  
4 paragraph -- wait, no, it's not 189. It's  
5 September. 190.

11:55:47

6 All right. [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 A. Okay.

10 Q. All right.

11:56:12

11 [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 Do you see that?

11:56:27

16 A. I see that.

17 Q. All right. All right.

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

11:56:53

21 A. No, I don't remember any discussions, [REDACTED]

22 [REDACTED]

23 Q. All right.

24 [REDACTED]

[REDACTED]

11:57:04

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 133

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3

A. No, I did not participate in discussions.

4

Q. Okay. And -- and before, from the --

5

before this lawsuit was filed, [REDACTED]

6

7

8

9

10

MR. FUNG: Object as calling for

11:57:42

11

privilege.

12

Caution the witness not to disclose

13

privileged communications.

14

THE WITNESS: No.

15

BY MR. ISAACSON:

11:57:54

16

Q. All right.

17

18

19

20

21

22

23

24

25

11:58:57

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 134

1

[REDACTED]

2

[REDACTED] [REDACTED]

3

[REDACTED]

4

Q. All right.

5

[REDACTED] [REDACTED]

6

[REDACTED]

7

[REDACTED]

8

[REDACTED] [REDACTED]

9

[REDACTED]

10

[REDACTED] [REDACTED]

11

[REDACTED]

12

[REDACTED]

13

[REDACTED] [REDACTED]

14

[REDACTED]

15

[REDACTED] [REDACTED]

16

[REDACTED]

17

MR. FUNG: Objection to form.

18

THE WITNESS: I don't know if Arm did or

19

not.

20

BY MR. ISAACSON:

12:00:47

21

Q. [REDACTED]

22

[REDACTED]

23

[REDACTED] ?

24

MR. FUNG: Objection. Calls for

25

privilege.

12:01:06



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 135

1 Caution the witness not to reveal the  
2 contents of any privileged communications.

3 THE WITNESS: [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

7 BY MR. ISAACSON:

8 Q. [REDACTED]  
[REDACTED]  
[REDACTED]

12:01:24

11 MR. FUNG: Same objection. Same caution.

12 THE WITNESS: I don't know.

13 MR. ISAACSON: All right. Can we -- can  
14 we look at this? I'm not going to do this.

15 BY MR. ISAACSON:

12:02:41

16 Q. All right.

17 And then -- again, returning to 190, the  
18 agree- -- [REDACTED]  
[REDACTED]

19 -- '2972.

12:03:24

21 A. Are we in Exhibit 190?

22 Q. Yes. It should be attached to your 190.

23 MR. FUNG: It is not attached to mine.

24 THE WITNESS: It's not attached to mine

25 either.

12:03:37

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 136

1 MR. ISAACSON: Oh, okay. [REDACTED]

2 [REDACTED]  
3 [REDACTED]  
4 Okay. We'll mark this as -- what's the  
5 next number? 12:04:22

6 THE COURT REPORTER: 194.

7 MR. ISAACSON: 194. Maybe you already  
8 have this, but...

9 (Tran Deposition Exhibit 194 was marked  
10 for identification.) 12:04:45

11 BY MR. ISAACSON:

12 Q. All right.

13 So Exhibit 194 is [REDACTED]  
14 [REDACTED] Bates stamped

15 ARM\_'2972 to '2987. 12:05:19

16 Do you recognize this as [REDACTED]

17 [REDACTED]  
18 A. Yes, but there's a second one.

19 Q. A subsequent one, yeah.

20 But as -- as of this date, this was the 12:05:31  
21 relevant [REDACTED] correct?

22 A. Yes.

23 Q. The -- all right.

24 The -- [REDACTED]

[REDACTED] 12:06:33

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 137

1

2

3

A. Yes.

4

Q.

5

6

7

8

9

10

12:07:13

11

MR. FUNG: Objection to form.

12

THE WITNESS: I don't know.

13

BY MR. ISAACSON:

14

Q.

15

16

17

18

19

20

21

22

23

24

25

12:08:07

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 138

1 MR. ISAACSON: So this would be a good  
2 time for lunch.

3 THE VIDEOGRAPHER: Going off the record.  
4 The time is 12:09.

5 (Lunch recess taken.) 12:09:08

6 THE VIDEOGRAPHER: We're back on the  
7 record. The time is 12:51.

8 BY MR. ISAACSON:

9 Q. All right. I will show you what's been  
10 previously marked as QX55. 12:51:43

11 (Previously marked Deposition Exhibit QX55  
12 was referenced.)

13 THE WITNESS: Thank you.

14 BY MR. ISAACSON:

15 Q. I believe you referred to this document 12:51:56  
16 before. This is -- do you recognize this as [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20 A. Yes. 12:52:12

21 Q. All right.

22 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12:52:30

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 139

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13

A. I don't know if they're the same or

14

different. █

15

Q. All right.

12:53:19

16

So just to help you out then, take a look

17

at what we marked as Exhibit 194. That's the

18

earlier one.

19

A. It looks like there have been some

20

changes.

12:53:53

21

Q. Yes. And previously, █, █

█

█

█

█

12:54:17

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 140

1 MR. FUNG: Objection. Form.

2 THE WITNESS: [REDACTED]

3 [REDACTED]

4 BY MR. ISAACSON:

5 Q. Right. [REDACTED] [REDACTED]

6 [REDACTED]

7 [REDACTED] ?

8 MR. FUNG: Objection. Form.

9 THE WITNESS: [REDACTED]

10 [REDACTED]

12:54:46

11 BY MR. ISAACSON:

12 Q. I'm sorry, I'm not sure what you're  
13 referring to.

14 A. [REDACTED]

15 [REDACTED] [REDACTED]

12:54:58

16 Q. Okay. All right.

17 And so, is it your belief that -- [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED]

24 [REDACTED] [REDACTED]

25 [REDACTED]

12:55:54

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 141

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8

MR. FUNG: Objection. Form.

9

THE WITNESS: I don't know what it

10

consists of specifically in its entirety.

12:56:32

11

MR. ISAACSON: All right. Let me have the

12

12/20/21. This.

13

And the next number is 195?

14

THE COURT REPORTER: Yes.

15

MR. ISAACSON: Thanks.

12:57:12

16

All right. Can we mark this as QX195.

17

(Tran Deposition Exhibit 195 was marked

18

for identification.)

19

BY MR. ISAACSON:

20

Q. QX195, it's Bates stamped ARM\_'88656

12:58:05

21

through '684. It's entitled

22

23

[As read]

24

Have you seen this document before?

25

MR. FUNG: I'll object to this line of

12:58:34

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 142

1 questions about this document as outside the scope  
2 of the 30(b)(6) notice. She can testify in her  
3 personal capacity.

4 THE WITNESS: No, I've never seen it  
5 before.

12:58:45

6 BY MR. ISAACSON:

7 Q. All right.

8 Did you have any involvement in regulatory  
9 submissions with respect to the potential  
10 acquisition by Nvidia of Arm?

12:58:52

11 A. What do you mean by "involvement"?

12 Q. Well, describe to me any involvement that  
13 you had in regulatory submissions having to do with  
14 the potential acquisition by Nvidia of Arm.

15 A. [REDACTED]

[REDACTED]

17 Q. The -- so this is a submission that was  
18 made in the United Kingdom to the competition  
19 authority there, the CMA.

20 Were you aware that there were proceedings  
21 in the CMA relating to whether the acquisition by  
22 Nvidia of Arm would be approved?

12:59:44

23 MR. FUNG: Objection to form.

24 THE WITNESS: I'm sorry, was I aware that  
25 what was?

12:59:56



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 143

1 BY MR. ISAACSON:

2 Q. That there were regulatory proceedings in  
3 the United Kingdom, in Great Britain, to determine  
4 whether the po- -- the acquisition -- an acquisition  
5 by Nvidia of Arm would be approved?

01:00:07

6 MR. FUNG: Objection to form.

7 THE WITNESS: I'm aware, yes.

8 BY MR. ISAACSON:

9 Q. Okay. And -- so these are statements  
10 being made to the regulatory authority in the United  
11 Kingdom.

01:00:19

12 And if you look at page 6, under Section  
13 E, the first paragraph -- do you see Section E in  
14 the first paragraph?

15 A. Mm-hmm.

01:00:43

16 Q. And the second sentence there says, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

25 MR. FUNG: Objection to form.

01:01:14

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 144

1 THE WITNESS: I didn't write this.

2 BY MR. ISAACSON:

3 Q. I understand that.

4

■

■

7 MR. FUNG: Objection to form.

8 THE WITNESS: Yes.

9 BY MR. ISAACSON:

10 Q. All right.

01:01:35

11 And then at the bottom of page 7, the  
12 first three words there -- or the -- the last three  
13 words on page 7, continuing on to the next page, it  
14 says, [REDACTED]

■

■

■

■

■

■

21 MR. FUNG: Objection to form.

22 THE WITNESS: That's correct, [REDACTED]

■

24 BY MR. ISAACSON:

25 Q. All right.

01:02:27

■ :07

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 145

1 And then on page 21, there's a section  
2 called [REDACTED]

3                   A.     Yes, I see it.

4 Q. And the second paragraph there says,

Row	Bar Length (approx. %)
1	75
2	85
3	80
4	90
5	85
6	20
7	70
8	85
9	30
10	10

14 MR. FUNG: Objection to form.

15 THE WITNESS: [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

17 BY MR. ISAACSON:

18 Q. Okay. And do you have any explanation why

Country	Number of cases
United States	19
France	18
Germany	17
Italy	16

23 MR. FUNG: Objection to form.

24 THE WITNESS: I can't speculate or gu- --

25	or guess to that.	01:03:41
----	-------------------	----------

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 146

1 BY MR. ISAACSON:

2 Q. So on page 15, in the first full

3 paragraph, it says, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 MR. FUNG: Objection to form.

13 THE WITNESS: I don't think I understand

14 the context of what -- of where this paragraph is --

15 the context of the paragraph.

01:05:05

16 BY MR. ISAACSON:

17 Q. Okay. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

01:06:34

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 147

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█

01:07:19

16

MR. FUNG: Objection to form.

17

THE WITNESS: Yes -- yes, that's correct.

18

MR. ISAACSON: All right. Let's -- let's

19

do January 12, 2021.

20

This will be 196. Is that what we're on?

01:08:22

21

THE COURT REPORTER: Yes.

22

MR. ISAACSON: No, did I give -- hold on a

23

second here.

24

There, that looks better.

25

Thanks.

01:08:41

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 148

1 THE COURT REPORTER: Counsel.

2 MR. ISAACSON: Oh, it's previously -- I'm  
3 sorry, you're right. It's previously been marked as  
4 QX52. So --

5 (Previously marked Deposition Exhibit QX52 01:08:47  
6 was referenced.)

7 MR. FUNG: Thank you.

8 BY MR. ISAACSON:

9 Q. So QX52 is Bates stamped ARM\_'1242365 and  
10 '66. This is a Teams message produced by Arm. 01:09:05  
11 The -- or a series of messages. And these include  
12 communications with Karthik Shivashankar, who you  
13 told me who he was this morning, but would you  
14 remind me?

15 A. Yeah, he is the senior director of 01:09:32  
16 licensing.

17 Q. Okay. All right.

18 And who is Paul Williamson?

19 A. He's the general manager of the IoT line  
20 of business. 01:10:02

21 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

01:10:23

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 149

1 MR. FUNG: Objection to form.

2 Also caution the witness not to disclose  
3 the contents of privileged communications.

4 THE WITNESS: No, I was not involved.

5 BY MR. ISAACSON:

01:10:32

6 Q. So, for example, Mr. Williamson says,

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

[REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 MR. FUNG: Objection to form.

01:10:59

16 BY MR. ISAACSON:

17 Q. [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

[REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 A. No.

25 Q. Okay. Karthik Sha- -- Shivashankar says,

01:11:21

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 150

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2

3

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5

6

7

MR. FUNG: Objection to form.

8

THE WITNESS: I was not aware of any

9

discussions on that.

10

MR. ISAACSON: All right.

01:12:00

11

February 10th and March 16th.

12

BY MR. ISAACSON:

13

Q. So after Qualcomm's -- well, actually, in

14

connection with Qualcomm's acquisition of Nuvia,

15

16

17

MR. FUNG: Objection. Form. Also calls

18

for privilege.

19

Caution the witness not to disclose the

20

contents of any privileged communications.

01:12:38

21

THE WITNESS: I think there were some

22

discussions around it, yes.

23

BY MR. ISAACSON:

24

Q. And what was your involvement in those

25

discussions?

01:12:45



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 151

1 MR. FUNG: Same caution as to privilege.

2 THE WITNESS: I don't think I can answer  
3 that without revealing any privileged information.

4 BY MR. ISAACSON:

5 Q. I don't want any communications that you 01:12:54  
6 received or sent. I just would like you to define  
7 your role in that.

8 MR. FUNG: Same caution.

9 THE WITNESS: [REDACTED]

10 [REDACTED] 01:13:02

11 THE COURT REPORTER: Could you say that  
12 again? "I think"?

13 THE WITNESS: -- [REDACTED]

14 [REDACTED]

15 [REDACTED] 01:13:09

16 BY MR. ISAACSON:

17 Q. And did you have discussions about

18 [REDACTED]

19 [REDACTED]

20 [REDACTED] 01:13:23

21 MR. FUNG: Objection. Calls for  
22 privilege.

23 Caution the witness not to reveal the  
24 contents of any privileged communications.

25 If you can do so, you can answer. 01:13:27

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 152

1 THE WITNESS: No.

2 BY MR. ISAACSON:

3 Q. This may have been my fault because I -- I  
4 want to make sure I got the question right on the  
5 record --

01:13:50

6 A. Okay.

7 Q. -- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 MR. FUNG: Same objection as to privilege.

13 Same caution to the witness.

14 MR. ISAACSON: And that's a yes-or-no  
15 question.

01:14:11

16 THE WITNESS: [REDACTED]

17 MR. ISAACSON: All right.

18 So this would be 196.

19 (Tran Deposition Exhibit 196 was marked  
20 for identification.)

01:14:40

21 BY MR. ISAACSON:

22 Q. Exhibit 196 is a series of Teams messages  
23 Bates stamped ARM\_ '97557 through '62 beginning on  
24 February 10th, 2020.

25 And on page '60 -- '560, on February 10th

01:15:04

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 153

1 at [verbatim] 2021 at 5:22 [sic] -- so it's the  
2 fourth one down on the page -- there's a message  
3 from Karthik Shivashankar saying, [REDACTED]

4 [REDACTED]

5 [REDACTED] [REDACTED] [REDACTED]

6 [REDACTED] [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

01:15:53

11 MR. FUNG: Objection to form.

12 THE WITNESS: [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 BY MR. ISAACSON:

01:16:04

16 Q. [REDACTED]

17 [REDACTED]

18 MR. FUNG: Objection to form.

19 THE WITNESS: I'm -- I was not aware.

20 BY MR. ISAACSON:

01:16:14

21 Q. Okay. [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

[REDACTED]:26

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 154

1 MR. FUNG: Objection to form.

2 Also caution the witness not to disclose  
3 privileged communications.

4 THE WITNESS: I was not involved.

5 MR. ISAACSON: All right. 01:16:36

6 And then -- let me have the March 16th.

7 This should be 197.

8 (Tran Deposition Exhibit 197 was marked  
9 for identification.)

10 BY MR. ISAACSON: 01:17:02

11 Q. Exhibit QX197 is Bates stamped  
12 ARM\_'1293190 through '203. It's a series of Teams  
13 messages.

14 And -- all right.

15 And on page 195 -- actually, 194, it says 01:17:38

16 in the middle of the page on March 16th, 2021, at

17 3:44, Karthik Shivashankar, or it's -- one, two,

18 three, four, five -- six up, it says, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

22 Who is Mr. Bhatnagar?

23 A. He works for Karthik.

24 Q. Okay. [REDACTED]

[REDACTED] 01:18:39

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 155

1 [REDACTED] ?

2 MR. FUNG: Objection to form.

3 THE WITNESS: [REDACTED]

4 [REDACTED].

5 BY MR. ISAACSON:

01:19:03

6 Q. All right.

7 The -- you don't -- do you know, [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 MR. FUNG: Objection to form.

01:19:15

11 THE WITNESS: [REDACTED]

12 BY MR. ISAACSON:

13 Q. All right.

14 The -- then you continue to the next page,

15 there's a discussion of a deck that's being

01:19:22

16 prepared.

17 Do you see that?

18 A. Yes.

19 Q. It says at the bottom, [REDACTED]

20 [REDACTED] [REDACTED] [REDACTED]

21 [REDACTED]

22 [REDACTED] [REDACTED]

23 [REDACTED]

24 A. Yes.

25 Q. And who is Doreen?

01:19:44

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 156

1 A. She was on the legal team.

2 Q. All right.

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

01:19:58

6 MR. FUNG: Objection to form.

7 THE WITNESS: I don't remember.

8 BY MR. ISAACSON:

9 Q. All right.

10 And in terms of the Qualcomm ALA that we

01:20:25

11 looked at earlier, this was Exhibit 191. [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED]

[REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

[REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

01:22:05

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 157

1

[REDACTED]

2

MR. FUNG: Objection. Form.

3

THE WITNESS: Yes, that's correct.

4

BY MR. ISAACSON:

5

Q. All right.

01:22:20

6

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

■

[REDACTED]

■

■

[REDACTED]

[REDACTED]

■

[REDACTED]

■

■

[REDACTED]

■

[REDACTED]

19

MR. ISAACSON: Let's see. June 6th, 2020.

20

No, actually, I'll leave that -- I'll

01:23:04

21

leave that be.

22

BY MR. ISAACSON:

23

Q. And then looking at the actual license in

24

this agreement, [REDACTED]

■

[REDACTED]

01:23:57

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 158

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22

23

24

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] correct?

01:24:14

A. Yes.

Q. Okay. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

MR. FUNG: Objection. Form.

01:25:15

THE WITNESS: Yes.

BY MR. ISAACSON:

Q. And putting those together, the Qualcomm

ALA [REDACTED]

[REDACTED] correct?

01:25:25



HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 159

1 MR. FUNG: Objection. Form.

2 THE WITNESS: [REDACTED]

3 [REDACTED]

4 BY MR. ISAACSON:

5 Q. Right. [REDACTED] ?

01:25:34

6 A. Yes.

7 Q. The -- now, looking at [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

[REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

[REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

[REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 A. Excuse me.

01:27:10

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Page 160

1 Q. -- [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9 MR. FUNG: Objection. Form.

10 THE WITNESS: [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

13 BY MR. ISAACSON:

14 Q. [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

17 MR. FUNG: Objection. Form.

18 THE WITNESS: Yes, it looks like it.

19 BY MR. ISAACSON:

20 Q. Now, for a core to be compliant with Arm 01:28:15

21 architecture, [REDACTED]

[REDACTED]

23 MR. FUNG: Objection. Form. Also,

24 outside the scope of the 30(b)(6) topics. The

25 witness may answer in her personal capacity. 01:28:27

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 161

1

THE WITNESS: [REDACTED]

2

[REDACTED].

3

BY MR. ISAACSON:

4

Q. [REDACTED]

5

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

6

[REDACTED]

7

[REDACTED] [REDACTED] [REDACTED]

8

[REDACTED]

9

[REDACTED]

10

[REDACTED]

01:28:54

11

MR. FUNG: Objection. Form.

12

THE WITNESS: [REDACTED]

13

[REDACTED] [REDACTED]

14

[REDACTED]

15

BY MR. ISAACSON:

01:29:02

16

Q. Okay. Looking at [REDACTED]

17

[REDACTED]

18

[REDACTED]

19

[REDACTED]

20

[REDACTED]

01:29:32

21

A. Sorry, the pages on mine are --

22

Q. Page 8 of 13 --

23

A. -- kind of off.

24

Q. -- at the bottom. [REDACTED]

25

[REDACTED]

01:29:46

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Page 162

1 A. Yes.

2 MR. FUNG: So, Counsel, the exhibit I've  
3 been handed has two copies stapled together.

4 MR. ISAACSON: Oh.

5 MR. FUNG: I'm not sure what is going on 01:30:03  
6 here.

7 MR. ISAACSON: Hopefully, there's one  
8 complete -- the other one -- pages 1 through -- oh.

9 THE WITNESS: Yeah, my --

10 MR. ISAACSON: Yeah, I see it. I got -- 01:30:13

11 MR. BUTWIN: For this copy, that's sort  
12 of -- that's how it was produced -- that's how it's  
13 been produced.

14 MR. ISAACSON: Okay. All right. I'll  
15 live with that, and just still ask -- see -- 01:30:20

16 BY MR. ISAACSON:

17 Q. If you turn to the first page, 8 of 13,

18 [REDACTED]

19 A. Yes, I see it.

20 Q. Okay. And there it says, [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

24 Do you see that?

25 A. Yes. 01:30:39

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 163

1 Q. Okay. Is there anything within the  
2 agreement that says that [REDACTED]

3 [REDACTED]

4 MR. FUNG: Objection. Form.

5 THE WITNESS: [REDACTED] [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED] [REDACTED]

11 [REDACTED]

12 BY MR. ISAACSON:

13 Q. All right. The -- all right.

14 And then if I can take you back to the

15 Nuvia ALA, and we were looking at the signed copies 01:32:06

16 in QX190. And back to [REDACTED]

17 [REDACTED].

18 A. Yes.

19 Q. And you see [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 A. Yes.

23 Q. Okay. [REDACTED]

24 [REDACTED].

25 Do you see that? 01:33:02

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 164

1 MR. FUNG: Object -- Objection. Form.

2 THE WITNESS: I see it there, but I don't

3 know why it's there.

4 BY MR. ISAACSON:

5 Q. All right.

01:33:11

6 And do you know that -- do the ob- -- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

01:34:28

16 Q. All right.

17 So you would not apply -- you do not

18 believe the [REDACTED]

[REDACTED]

20 MR. FUNG: Objection. Form.

01:34:43

21 THE WITNESS: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

01:35:00

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 165

1 BY MR. ISAACSON:

2 Q. [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 MR. FUNG: Objection. Form.

9 THE WITNESS: [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 BY MR. ISAACSON:

14 Q. All right.

15 But does that mean -- so I still can't

01:35:35

16 tell from your answer. You're giving me the words

17 back.

18 But in your interpretation, once you read

19 this, is it your understanding that [REDACTED]

20 [REDACTED]

01:35:51

21 MR. FUNG: Objection. Asked and answered.

22 THE WITNESS: [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

01:36:11

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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1 BY MR. ISAACSON:

2 Q. [REDACTED]

3 [REDACTED]

4 MR. FUNG: Objection. Asked and answered.

5 Also to the form of the question.

01:36:24

6 THE WITNESS: [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 MR. ISAACSON: Okay. All right. Let me  
10 take a break, and I'll be wrapping up soon, so...

01:36:36

11 MR. FUNG: Five-minute break then?

12 MR. ISAACSON: Yeah, okay. Might be ten.

13 THE VIDEOGRAPHER: We're going off the  
14 record. The time is 1:36.

15 (Short recess taken.)

01:55:23

16 THE VIDEOGRAPHER: Going back on the  
17 record. The time is 1:55.

18 MR. ISAACSON: I have -- I have no more  
19 questions for you today.

20 THE COURT REPORTER: One second.

01:55:37

21 MR. ISAACSON: No more questions for you  
22 today. Thank you for your time.

23 Just for the record, Qualcomm reserves its  
24 rights with respect to the parties' discussions on  
25 Topics 14 and 43.

01:55:47



## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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1 As you are aware, the parties disagree  
2 with respect to the scope of the testimony that Arm  
3 must be -- must provide. And this has to do with  
4 redactions to ALAs that the parties have had  
5 disputes about.

01:55:59

6 And Qualcomm -- Arm has limited its  
7 testimony to unredacted revisions of the ALA and we  
8 have -- these ALAs, and we've not agreed to that.  
9 And -- and that also pertains to 43 with respect to

10

11

12 And then we also reserve our rights to  
13 review this testimony and reach conclusions about  
14 whether the witness has been properly prepared as a  
15 30(b)(6) witness.

01:56:30

16 And we don't expect you to agree with any  
17 of that. We're just reserving our rights.

18 MR. FUNG: Understood. We obviously  
19 disagree. We've produced the redacted versions of  
20 the ALAs. We've also produced lesser redacted  
21 versions of the ALAs.

01:56:45

22 We've made this witness available to  
23 testify as to those ALAs. You have declined to  
24 pursue any testimony on those ALAs.

25 And we ob- -- obviously disagree that this

01:56:53

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 168

1 witness was unprepared for any of the other topics  
2 on which she was asked about, so we consider this  
3 deposition closed on these topics.

4 And I would like to take a five-minute  
5 break before coming back. I might have -- I might 01:57:06  
6 have some questions.

7 MR. ISAACSON: Okay.

8 MR. FUNG: But take a -- take a  
9 five-minute break.

10 THE VIDEOGRAPHER: Going off the record. 01:57:12  
11 The time is 1:57.

12 (Short recess taken.)

13 THE VIDEOGRAPHER: Going back on the  
14 record. The time is 2:06.

15 MR. FUNG: We have no questions. 02:06:27

16 We designate this transcript highly  
17 confidential, attorneys' eyes only, pending further  
18 review. And the witness reserves the right to  
19 review the transcript.

20 With that, we are done. 02:06:38

21 MR. ISAACSON: Good luck with the traffic  
22 to San Jose.

23 THE VIDEOGRAPHER: We're off the record at  
24 4:0 -- 2:06 p.m., and this concludes today's  
25 testimony given by Christine Tran. The total number 02:06:52

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1 of media units used was six and will be retained by  
2 Veritext.

3 (Proceedings concluded, 2:06 p.m.,  
4 December 19, 2023.)  
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Page 170

CERTIFICATE OF REPORTER

I, Hanna Kim, a Certified Shorthand Reporter, do hereby certify:

That prior to being examined, the witness in the foregoing proceedings was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth;

That said proceedings were taken before me at the time and place therein set forth and were taken down by me in shorthand and thereafter transcribed into typewriting under my direction and supervision;

I further certify that I am neither counsel for, nor related to, any party to said proceedings, not in anywise interested in the outcome thereof.

Further, that if the foregoing pertains to the original transcript of a deposition in a federal case, before completion of the proceedings, review of the transcript [x] was [ ] was not requested.

In witness whereof, I have hereunto subscribed my name.



Hanna Kim

CLR, CSR No. 13083

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 171

Nicholas Fung, Esq.

nfung@mofo.com

December 22, 2023

RE: ARM Ltd. v. Qualcomm Inc., Et Al.

12/19/2023, Christine Tran (#6326938)

The above-referenced transcript is available for review.

Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet.

The witness should sign the Acknowledgment of Deponent and Errata and return to the deposing attorney. Copies should be sent to all counsel, and to Veritext at cs-ny@veritext.com.

Return completed errata within 30 days from receipt of testimony.

If the witness fails to do so within the time allotted, the transcript may be used as if signed.

Yours,

Veritext Legal Solutions

## HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

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1 ARM Ltd. v. Qualcomm Inc., Et Al.

2 Christine Tran (#6326938)

## 3 E R R A T A S H E E T

4 PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

5 \_\_\_\_\_

6 REASON \_\_\_\_\_

7 PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

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9 REASON \_\_\_\_\_

10 PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

11 \_\_\_\_\_

12 REASON \_\_\_\_\_

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14 \_\_\_\_\_

15 REASON \_\_\_\_\_

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18 REASON \_\_\_\_\_

19 PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

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21 REASON \_\_\_\_\_

22 \_\_\_\_\_

23 \_\_\_\_\_

24 Christine Tran

Date

25

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

Page 173

1 ARM Ltd. v. Qualcomm Inc., Et Al.

2 Christine Tran (#6326938)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Christine Tran, do hereby declare that I  
5 have read the foregoing transcript, I have made any  
6 corrections, additions, or changes I deemed necessary as  
7 noted above to be appended hereto, and that the same is  
8 a true, correct and complete transcript of the testimony  
9 given by me.

10  
11 \_\_\_\_\_  
12 Christine Tran

\_\_\_\_\_ Date

13 \*If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 \_\_\_\_\_ DAY OF \_\_\_\_\_, 20\_\_\_\_.

16  
17 \_\_\_\_\_  
18  
19 NOTARY PUBLIC  
20  
21  
22  
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25

# Exhibit 10



**From:** Sender Unspecified  
**To:** Manu Gulati <>;Ziad Asghar <>  
**Sent:**  
**Subject:** (No Subject)  
**Attachments:** rsmf.zip

Ziad Asghar  
2022-01-19T19:50:28.0000000Z  
do arm know that we are using [REDACTED] based on our use of the tools?

Ziad Asghar  
2022-01-19T19:50:32.0000000Z  
does

# **Exhibit 11**

ZIAD ASGHAR Conf. AEO - 30b6  
ARM, LTD. V. QUALCOMM INC.

November 08, 2023

1

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ARM LTD., a U.K. corporation, )  
 )  
Plaintiff, ) Case No. 22-1146-MN  
 )  
vs. )  
 )  
QUALCOMM INC., a Delaware )  
corporation, QUALCOMM TECHNOLOGIES, )  
INC., a Delaware corporation, and )  
NUVIA, INC., a Delaware )  
corporation, )  
 )  
Defendants. )  
\_\_\_\_\_ )

C O N F I D E N T I A L

ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF QUALCOMM 30(b)(6)  
designee ZIAD ASGHAR

Deposition taken on:  
Wednesday, November 8, 2023, 8:39 a.m.

12531 High Bluff Drive, Suite 100  
San Diego, California

Reported By: Kimberly Reichert, CSR 10986  
Job No. J10465669

ZIAD ASGHAR Conf. AEO - 30b6  
ARM, LTD. V. QUALCOMM INC.

November 08, 2023

2

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ARM LTD., a U.K. corporation, )  
 )  
Plaintiff, ) Case No. 22-1146-MN  
 )  
vs. )  
 )  
QUALCOMM INC., a Delaware )  
corporation, QUALCOMM TECHNOLOGIES, )  
INC., a Delaware corporation, and )  
NUVIA, INC., a Delaware )  
corporation, )  
 )  
Defendants. )  
\_\_\_\_\_ )

C O N F I D E N T I A L

ATTORNEYS' EYES ONLY videotaped deposition  
of QUALCOMM 30(b)(6) designee ZIAD ASGHAR, taken on  
behalf of the Plaintiff, at 12531 High Bluff Drive,  
Suite 100, San Diego, California, commencing at  
8:39 a.m., Wednesday, November 8, 2023, before  
Kimberly Reichert, Certified Shorthand Reporter  
No. 10986.

ZIAD ASGHAR Conf. AEO - 30b6  
ARM, LTD. V. QUALCOMM INC.

November 08, 2023

3

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24 Also Present: Rene Sanchez, Videographer  
25

## I N D E X

DEPONENT	EXAMINED BY	PAGE
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ZIAD ASGHAR	MR. MUINO	9
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Plaintiff's

Exhibit 1	LinkedIn Profile for Ziad Asghar	14
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Exhibit 2	Arm Ltd's First Notice of Deposition of Qualcomm	29
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Exhibit 3	Arm Ltd's First Notice of Deposition of Nuvia, Inc.	34
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Exhibit 4	Amended and Restated Architecture License Agreement between Arm Limited and Qualcomm Global Trading	36
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Exhibit 5	E-mail to Andy Oberst from Ziad Asghar dated 5/15/2013	75
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Exhibit 6	A document about Arm as a company and looking at what their business model looks like	76
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Exhibit 7	E-mail chain top e-mail to Akash Palkhiwala dated 3/10/2019	87
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Exhibit 8	E-mail chain top e-mail to Travis Lanier, et al. dated 9/9/2019	95
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Exhibit 9	Document entitled "ARM alternative strategies"	99
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Exhibit 10	E-mail chain top e-mail to Quinn Li, et al. dated 6/19/2020	105
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3	Exhibit 11 E-mail chain	115
4	top e-mail to Cristiano Amon, et al.	
	dated 8/27/2020	
5	Exhibit 12 E-mail chain	126
6	top e-mail to Azzedine Touzni, et al.	
	dated 1/13/2021	
7	Exhibit 13 Document entitled "Qualcomm to	140
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9	Exhibit 14 E-mail chain	144
10	top e-mail to Michelle Gerevas	
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11	Exhibit 15 E-mail to Rajiv Gupta, et al.	146
12	from Raghu Sankuratri	
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13	Exhibit 16 Letter to Paul Williamson	157
14	from Ziad Asghar	
	dated 1/27/2021	
15	Exhibit 17 E-mail to Ziad Asghar	167
16	from Paul Williamson	
	dated 5/18/2021	
17	Exhibit 18 E-mail chain	171
18	top e-mail to Rajiv Gupta, et al.	
	dated 7/1/2021	
19	Exhibit 19 Letter to Ziad Asghar	171
20	from Paul Williamson	
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21	Exhibit 20 Letter to Paul Williamson	176
22	from Ziad Asghar	
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23	Exhibit 21 Letter to Paul Williamson	179
24	from Ziad Asghar	
25	dated 2/25/2021	

1	EXHIBITS FOR IDENTIFICATION (Cont.)	PAGE
2	Plaintiff's	
3	Exhibit 22 Technology License Agreement	184
4	between Arm Limited and Nuvia, Inc.	
5	Exhibit 23 Letter to Paul Williamson	192
6	from Ziad Asghar	
7	dated 3/14/2021	
8	Exhibit 24 E-mail chain	196
9	top e-mail from RK Chunduru	
10	dated 7/1/2021	
11	Exhibit 25 E-mail chain	202
12	top e-mail from Ziad Asghar	
13	dated 5/7/2022	
14	Exhibit 26 E-mail to Will Abbey, et al.	205
15	from Ziad Asghar	
16	dated 3/25/2021	
17	Exhibit 27 E-mail chain	207
18	top e-mail to Ziad Asghar	
19	dated 4/2/2021	
20	Exhibit 28 E-mail to Manu Gulati and	214
21	Ziad Asghar from Sender Unspecified	
22	Exhibit 29 E-mail chain	216
23	top e-mail to RK Chunduru	
24	dated 4/21/2021	
25	Exhibit 30 E-mail chain	221
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2	Plaintiff's	
3	Exhibit 34 E-mail chain	249
4	top e-mail to Asaf Shen, et al.	
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6	top e-mail to Alex Katouzian	
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8	top e-mail to Ziad Asghar and Jim	
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12	Krishnamohan from Sender Unspecified	
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14	top e-mail to Ziad Asghar, et al.	
	from Savi Soin	
	dated 11/21/2022	

## QUESTIONS INSTRUCTED NOT TO ANSWER:

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ZIAD ASGHAR Conf. AEO - 30b6  
ARM, LTD. V. QUALCOMM INC.

November 08, 2023

8

SAN DIEGO, CALIFORNIA

WEDNESDAY, NOVEMBER 8, 2023; 8:39 A.M.

THE VIDEOGRAPHER: Good morning. This is tape No. 1 to the videotaped deposition of Ziad Asghar testifying in the matter of Arm Limited, a UK Corporation versus Qualcomm Inc., et al. This case is being heard before the United States District Court for the District of Delaware. The case number is 22-1146-MN. This deposition is being held at 12531 High Bluff Drive, Suite 100 in San Diego, California 92130. Today's date is November 8th, 2023, and the time is 8:39 a.m. Pacific Standard Time.

My name is Rene Sanchez and I'm the videographer here with our court reporter Kim Reichert. Would counsel please introduce yourselves and your affiliations and the witness will be sworn.

MR. MUINO: Daniel Muino of Morrison & Foerster for plaintiff Arm Limited.

MR. BRALY: Jacob Braly with Paul, Weiss for defendants and the witness. With me are Catherine Nyarady, also from Paul, Weiss, and Kurt Kjelland from Qualcomm.

///

1 ZIAD ASGHAR,  
2 deponent, was sworn and examined  
3 and testified as follows:  
4

5 THE REPORTER: Mr. Asghar, will you raise your  
6 right hand for me, please. Do you solemnly state  
7 that the evidence you shall give in this matter now  
8 pending shall be the truth, the whole truth and  
9 nothing but the truth so help you God?

10 THE WITNESS: I do.

11

12 EXAMINATION

13 BY MR. MUINO:

14 Q Good morning, Mr. Asghar.

15 A Good morning.

16 Q Could you please state your name for the  
17 record?

18 A Ziad Asghar.

19 Q What is your current address?

20 A My current home address is [REDACTED]

21 [REDACTED] [REDACTED]

22 Q Are you currently employed by Qualcomm?

23 A I am.

24 Q And what is your current position at  
25 Qualcomm?

1           A     My current position is SVP product  
2 management or senior V.P. of product management.

3           Q     Is that for a specific Qualcomm product,  
4 like the Snapdragon product?

5           A     So my role is horizontally across the  
6 company, which means my team creates all the  
7 technology IPs from a product perspective for all  
8 the different businesses that Qualcomm operates in  
9 for application process and technology.

10          Q     Have you ever had your deposition taken  
11 before?

12          A     I have.

13          Q     How many times?

14          A     If I recall, once.

15          Q     When was that?

16          A     I believe it was during COVID times, so  
17 I'm not exactly sure, but a couple years plus.

18          Q     2020?

19          A     I don't remember exactly. I think about  
20 '20, '21.

21          Q     Do you recall which case that was?

22          A     This was a case that had to do with one of  
23 our -- a case that had to do with Samsung.

24          Q     You were testifying in your capacity as  
25 your position at Qualcomm?



1 A Yes.

2 Q Do you recall the -- in a general sense  
3 the nature of the case?

4 A It's been a little while, but it had to do  
5 with process technology.

6 Q Was Qualcomm the plaintiff or the  
7 defendant in the case?

8 A I think we were neither from what I  
9 recall, but it's been a while.

10 Q Apart from that, have you had your  
11 deposition taken on other occasions?

12 A No.

13 Q Have you ever testified in court?

14 A No, I haven't.

15 Q So you might remember from your last  
16 experience, but the basic ground rule here is that  
17 you and I should try to avoid speaking over one  
18 another so the court reporter can take down  
19 everything that we're saying. So, if you give me a  
20 chance to finish my questions, I'll give you a  
21 chance to answer fully; is that okay?

22 A Sounds good.

23 Q From time to time counsel might object to  
24 a question that I ask. Unless he instructs you not  
25 to answer a question, you should go ahead and answer

1 to the best of your ability.

2 Do you understand that?

3 A I understand.

4 Q I usually take breaks about every hour.

5 If you need a break in between, just let me know. I  
6 understand we will do a short lunch break today and  
7 I know there's an hour period where you need to have  
8 a meeting, so we will respect that time as well.

9 A I appreciate it.

10 Q Is there any reason that you can't give  
11 full and complete testimony today?

12 A Shouldn't be any reason.

13 Q Did you do anything to prepare for today's  
14 deposition?

15 A I had a discussion with my lawyers.

16 Q And which lawyers did you have a  
17 discussion with?

18 A All three of them here.

19 Q How many occasions did you meet with them?

20 A Just once.

21 Q When was that?

22 A Monday.

23 Q How long did that last?

24 A A few hours.

25 Q Did you review any documents to prepare

1 for your deposition today?

2 A We went through the information for some  
3 related information, yes.

4 Q Which information did you go through?

5 MR. BRALY: I'm going to caution you not to  
6 reveal anything that we discussed in the course of  
7 our prep on Monday.

8 BY MR. MUINO:

9 Q I'm just looking for the identity of  
10 documents that you looked at without revealing  
11 anything that you discussed with the attorneys.

12 MR. BRALY: I'm going to instruct you not to  
13 answer that question.

14 BY MR. MUINO:

15 Q Are you going to follow counsel's  
16 instruction?

17 A I will.

18 Q Do you recall, were there any documents  
19 that you reviewed that refreshed your recollection?

20 A Not much really.

21 Q Do you remember how many documents you  
22 looked at?

23 A I don't remember how many in number. We  
24 reviewed a few documents.

25 Q Apart from the meeting on Monday with

1 counsel, did you meet with or discuss or have  
2 discussions with anyone else to prepare for today's  
3 deposition?

4 A No.

5 Q Did you speak with anyone else at the  
6 company about their depositions?

7 A No.

8 Q You're aware that others at Qualcomm have  
9 had their depositions taken in connection with this  
10 case?

11 A Yes.

12 Q You haven't had a chance to speak with any  
13 of the others about their depositions?

14 A No.

15 MR. MUINO: I'd like to mark as Exhibit 1 some  
16 content from your LinkedIn page. This will be  
17 Asghar Exhibit 1.

18 (Plaintiff's Exhibit 1 was marked for  
19 identification by the deposition officer and is  
20 attached hereto.)

21 BY MR. MUINO:

22 Q Mr. Asghar, do you recognize this as  
23 content from your LinkedIn page?

24 A Yes, seems like it.

25 Q And I'm just going to use this to help us



1 go through your background. I'd like to go to the  
2 "Education" portion first on the second page. So it  
3 says here you obtained a Master's of Science degree  
4 in electrical engineering from Purdue University; is  
5 that correct?

6 A That's correct.

7 Q That was in 1997?

8 A That's right.

9 Q You attended the UC San Diego and you  
10 obtained an MBA in 2006; is that correct?

11 A That's right.

12 Q You also obtained a Master's of Science  
13 degree in telecommunications engineering from  
14 Southern Methodist University in 2000; is that  
15 correct?

16 A That's right.

17 Q I'm doing this out of order. Then  
18 University of Alabama, Bachelor of Science in  
19 electrical engineering. You obtained that degree in  
20 1996?

21 A That's correct.

22 Q Your time as a student at any of these  
23 institutions, did you study anything or learn  
24 anything about Arm technology, do you recall?

25 A I don't recall.

1 Q At the time --

2 A It's been a little while.

3 Q Understood. At the time do you recall if  
4 you were aware of Arm the company or its technology?

5 A Not as much really, not that I recall.

6 Q I'd like to take a look at your  
7 professional experience, and let's do it backwards.  
8 Let's start on the second page. Texas Instruments,  
9 it says here you were a senior systems engineer and  
10 project lead from October 2000 to January 2007; is  
11 that correct?

12 A Yes.

13 Q And, generally speaking, what were your  
14 responsibilities in that role?

15 A This was communications systems  
16 engineering work for cellular standards.

17 Q Was this related to any particular TI  
18 products?

19 A Yes, this was related to TI products for  
20 the cellular market.

21 Q Did your work at TI in this time frame  
22 involve any Arm technology?

23 A No, I was more focused on the  
24 communications aspect of it, which was different.

25 Q Were you aware -- was TI an Arm licensee?

1 A Yes.

2 Q At the time, though, you weren't working  
3 on Arm technology?

4 A No.

5 Q All right. If we go up, the next position  
6 here is "3G R&D Texas Instruments, Inc."

7 Do you see that?

8 A Uh-huh.

9 Q What is 3G R&D?

10 A 3G is third-generation wireless standards  
11 research and development.

12 Q Was that a different role than the first  
13 role that we talked about at TI?

14 A It is an extension of that role still in  
15 the cellular technology domain.

16 Q Generally speaking -- let me back up. The  
17 title that you had here was "Systems Engineering  
18 Team Manager."

19 Do you see that?

20 A Yes.

21 Q And generally speaking, what were your  
22 responsibilities in that role?

23 A I had a small team that was working on  
24 developing UMTS modem algorithms.

25 Q Modem?

1 A UMTS modem, yes.

2 Q In that role were you working with Arm  
3 technology?

4 A No.

5 Q Okay. Next on the list chronologically,  
6 still at Texas Instruments, this is "Operator and  
7 Strategy Manager."

8 Do you see that?

9 A Yes.

10 Q And you held that position from June 2007  
11 to September 2008; is that correct?

12 A Yes, that's right.

13 Q Generally, what were your responsibilities  
14 in that role?

15 A It was to take cellular technologies and  
16 actually work with operators to get them deployed,  
17 essentially.

18 Q And again, did that position have any  
19 connection to Arm technology?

20 A No.

21 Q The next position here, and it appears the  
22 last position you held at Texas Instruments, was  
23 "OMAP Platform Manager"?

24 A That's right.

25 Q Do you see that?



1 A Uh-huh.

2 Q You held that position from October 2008  
3 to March 2010; is that correct?

4 A That's correct.

5 Q What does OMAP stand for?

6 A OMAP is an application processor for  
7 smartphones.

8 Q And what were your responsibilities in  
9 that position?

10 A So here, basically I had transitioned to  
11 product management work, so think of it as me  
12 defining the features and capabilities of this  
13 application processor.

14 Q Did that work pertain to Arm technology in  
15 any way?

16 A Arm technology was used in this  
17 application processor.

18 Q How was Arm technology used?

19 A So in a typical application processor you  
20 have multiple blocks. You might have a camera unit,  
21 video, a CPU, a graphics unit and so on and so  
22 forth. The CPU was licensed from Arm.

23 Q Do you remember which Arm CPU you were  
24 licensing for that purpose?

25 A It's been a little while. I don't recall

1 at this time, no.

2 Q What role did you have in connection with  
3 that Arm processor that was being used?

4 A So my role was more on the chip or product  
5 that TI was creating at that time. It was about  
6 what should be the capabilities of that CPU as it's  
7 implemented by Texas Instruments, which would be,  
8 you know, radius capabilities of processor, the Fmax  
9 and other things.

10 Q Did you have any responsibility with  
11 respect to the Arm license that TI had?

12 A I did not.

13 Q At the time, had you seen TI's Arm  
14 license?

15 A I hadn't.

16 Q All right. After Texas Instruments you  
17 went to work for Qualcomm; is that right?

18 A That's right.

19 Q You started out as a "Staff Manager, QCT  
20 Strategy"; is that correct?

21 A That's correct.

22 Q You held that position from April 2010 to  
23 September 2011; is that right?

24 A That's correct.

25 Q Why did you decide to join Qualcomm in

1 2010?

2 A Qualcomm had a lot of promise. It had  
3 great technology, and TI at that point in time was  
4 transitioning away from wireless, at least that was  
5 my reading.

6 Q What does QCT stand for?

7 A Qualcomm CDMA Technologies.

8 Q What were your responsibilities in that  
9 role?

10 A At this point in time, I was in a team  
11 that was working on competitive analysis of these  
12 chips that were provided for the smartphone space.

13 Q Competitive analysis you said?

14 A Uh-huh.

15 Q Do you recall who Qualcomm's competitors  
16 were in that space?

17 A There were a lot at that time, but  
18 companies like Texas Instruments, Broadcom, Ramsys,  
19 STRX, and so on.

20 Q In that role did you have any involvement  
21 with Arm technology?

22 A No.

23 Q Were you aware at that time that Qualcomm  
24 had Arm licenses?

25 A Yes, I was.

1 Q But at the time you didn't have any  
2 involvement in connection with those licenses?

3 A No.

4 Q Who were you reporting to when you were a  
5 staff manager for QCT strategy?

6 A At that time I was reporting to Keith  
7 Kressin.

8 Q Do you know what his position was?

9 A I believe he was -- at that time when I  
10 joined, he was senior director of QCT strategy.

11 Q Of QCT strategy?

12 A Yes, same job function.

13 Q The next position that you held at  
14 Qualcomm was "Director of QCT Strategy"; is that  
15 correct?

16 A That's right.

17 Q And did you take over Mr. Kressin's  
18 position?

19 A Not at this time.

20 Q You held that director position from  
21 October 2011 to April 2014; is that correct?

22 A That's right.

23 Q And what were your responsibilities in  
24 that role?

25 A It was still the competitive analysis



1 role, but expanded to have a larger team.

2 Q Who were you reporting to when you were in  
3 that position?

4 A I believe I was still reporting to Keith.

5 Q In that role, did you have any involvement  
6 with Arm or Arm technology?

7 A Not that I recall.

8 Q The next position listed here is "Senior  
9 Director, QCT Strategy"; is that correct?

10 A That's correct.

11 Q And you held that position from May 2014  
12 to April 2017; is that correct?

13 A That's right.

14 Q What were your responsibilities in that  
15 role?

16 A Still focused on competitive analysis,  
17 but, of course, helping define product for Qualcomm  
18 along with the competitor work.

19 Q Any involvement with Arm or Arm technology  
20 in that time frame?

21 A I may have been in meetings, but I don't  
22 recall exactly at this point in time.

23 Q Did your work in that role of senior  
24 director, did it involve the Arm licenses or license  
25 technology?

1 A At this time, no.

2 Q And who did you report to when you held  
3 that position?

4 A I'm not exactly sure when, but at some  
5 point in time Keith moved away. I don't know when  
6 that transition happened and I had other managers in  
7 the interim.

8 Q Do you remember which other managers you  
9 had?

10 A I don't really remember all of them, but  
11 one of them was Andy Oberst for a little bit and  
12 then he moved on.

13 Q Can you spell that last name?

14 A O-b-e-r-s-t.

15 Q All right. It states your next position  
16 was "Vice President, Product Management, Snapdragon  
17 Roadmap & Application Processor Technologies;" is  
18 that correct?

19 A That's right.

20 Q It says you held that position from  
21 April 2017 to November 2022; is that correct?

22 A That's right.

23 Q What were your responsibilities in that  
24 role?

25 A Yeah, in this role I was in charge of what

1 we call Roadmap planning, which means all the  
2 different chips that we do, and also looking at the  
3 application processor technologies from a product  
4 management perspective.

5 Q When you say "All the different chips that  
6 we do," what are you referring to?

7 A So Qualcomm creates chips or silicon  
8 products for different markets and, like I explained  
9 earlier, we have different technologies that go into  
10 these chips. So my role was defining exactly which  
11 technologies would go into each and every chip.

12 Q And is that -- you had responsibility at  
13 that point for all of the chips that Qualcomm  
14 manufactured?

15 A I think at the beginning it was just on  
16 the handset or the smartphone side, but later on it  
17 went into -- I don't know when exactly, but covering  
18 most of the chips that Qualcomm does.

19 Q The Snapdragon chip, is that a chip for  
20 mobile devices?

21 A Snapdragon is a marketing brand which goes  
22 across mobile, PC and other markets, not just for  
23 handset.

24 Q One of your responsibilities as VP of  
25 product management was for the Snapdragon family of



1 products?

2 A That's right.

3 Q Now, during this time did you have  
4 involvement with Arm or Arm technology?

5 A Yes.

6 Q What involvement did you have with Arm at  
7 this time?

8 A Just like when I'm defining these  
9 products, I have all these technologies that go in  
10 them. One of them is the CPU and the CPU is  
11 licensed from Arm.

12 Q Part of your role was interacting with Arm  
13 to license their technology for Qualcomm's purposes?

14 A Yes.

15 Q And were you the lead person at Qualcomm  
16 with respect to interacting with Arm?

17 MR. BRALY: Objection --

18 BY MR. MUINO:

19 Q You can answer.

20 A Like I explained, I had a previous manager  
21 who used to be doing this role so I'm not exactly  
22 sure when the transition happened, but somewhere  
23 around the role I was one of the people involved in  
24 the licensing with Arm, one of the team because it's  
25 a large team that works on this.

1 Q Other than you, who else at Qualcomm was  
2 involved in interacting with Arm with respect to  
3 licensing technology?

4 A We had product management team members,  
5 engineering team members, and we had contract team  
6 members and legal team members.

7 Q And in a hierarchal sense, were you the  
8 lead over the other guys or was this a horizontal  
9 structure?

10 A More horizontal structure.

11 Q The last position that's listed here for  
12 Qualcomm is "Senior Vice President Product  
13 Management, Snapdragon Application Processor  
14 Technologies & Roadmap"; is that correct?

15 A Yes.

16 Q You held that position from November of  
17 2022 to the present; is that right?

18 A That's right.

19 Q That's your position today?

20 A Yes.

21 Q Your responsibilities in that role, are  
22 they the same as the vice president  
23 responsibilities?

24 A Pretty much.

25 Q Did they change in any way?

1           A     A lot more focused on other technologies,  
2     working on artificial intelligence and really  
3     bringing those capabilities out to the market.

4           Q     In your position -- as your previous  
5     position as vice president product management, who  
6     were you reporting to?

7           A     In my role as vice president, the last  
8     before I transitioned to senior V.P., I was  
9     reporting to Chris Patrick.

10          Q     What was Mr. Patrick's position?

11          A     SVP and GM, I believe product management.

12          Q     And in your present role as SVP of product  
13     management, who do you report to?

14          A     I report to Durga Malladi now.

15          Q     Durga Malladi you said?

16          A     Yes.

17          Q     How do you spell the last name?

18          A     M-a-l-l-a-d-i.

19          Q     Is that a man or a woman?

20          A     It's a man.

21          Q     What is his position?

22          A     SVP and GM product management.

23          Q     At the top of this LinkedIn page it also  
24     says that you're a board member of EvoNexus; is that  
25     right?

1 A That's right.

2 Q What is EvoNexus?

3 A EvoNexus is a -- I think of it as an  
4 incubator that actually incubates new startups.

5 Q Is that connected to Qualcomm in any way?

6 A No, it's a local San Diego incubator.

7 Q You've held that position since August of  
8 2022; is that correct?

9 A That's right.

10 Q And you still hold that position?

11 A That's right.

12 Q Do you own any Qualcomm stock?

13 A Yes, I do.

14 MR. MUINO: I'd like to mark as Exhibit 2 "ARM  
15 LTD's First Notice of Deposition of Qualcomm, Inc.  
16 and Qualcomm Technologies, Inc. Pursuant to Federal  
17 Rule of Civil Procedure 30(b)(6)."

18 (Plaintiff's Exhibit 2 was marked for  
19 identification by the deposition officer and is  
20 attached hereto.)

21 BY MR. MUINO:

22 Q Mr. Asghar, have you seen this document  
23 before?

24 A I haven't.

25 Q This wasn't a document you reviewed in



1 preparation for today?

2 MR. BRALY: Don't answer that question.

3 BY MR. MUINO:

4 Q Are you going to follow your counsel's  
5 instruction?

6 A I will.

7 Q You said you don't recall having seen this  
8 document before; right?

9 A No.

10 Q I'd like to turn to page 8. Mr. Asghar,  
11 you understand that you have been designated by  
12 Qualcomm to testify on behalf of the company  
13 regarding certain topics today. Do you understand  
14 that?

15 A I do.

16 Q I want to just go through the topics to  
17 confirm these are the topics you're prepared to  
18 testify on. The first I understand is topic 15 that  
19 starts on the top of page 8. It says:

20 "Qualcomm's attempts to develop  
21 Arm-compatible cores and chipsets  
22 under Qualcomm ALA prior to  
23 Qualcomm's acquisition of Nuvia,  
24 including for each such attempt the  
25 timeline, Qualcomm's investment



1 (money and resources), the personnel  
2 involved, the outcome and an  
3 identification of any commercialized  
4 product(s) developed."

5 Do you see that?

6 A I do.

7 Q And are you prepared to testify on that  
8 topic today?

9 A Yes, as much as I recall.

10 Q Topic 16 is the second one, and it says:

11 "Qualcomm's acquisition of

12 Nuvia, including the timeline for

13 the acquisition, Qualcomm's reasons

14 for the acquisition and the terms

15 and conditions of the acquisition."

16 You are prepared to testify on that topic  
17 today?

18 A Yes.

19 Q The third topic is Topic 20. And it says:

20 "Qualcomm's development of any

21 products or technology using or

22 based on any products or technology

23 acquired from Nuvia based on

24 Qualcomm's acquisition of Nuvia."

25 You are prepared to testify on that topic

1 today?

2 A Yes.

3 Q The next topic is on page 12. It's Topic  
4 29 and it is:

5 "Qualcomm's or Nuvia's business  
6 plans and timeline for the Nuvia  
7 technology and Nuvia-based products  
8 including how, if at all, those  
9 business plans changed following  
10 Arm's termination of the Nuvia ALA."

11 A Yes.

12 Q You are prepared to testify on that topic  
13 today?

14 A Yes.

15 Q The next topic is 30. And it is:

16 "Qualcomm's or Nuvia's  
17 development plans and timeline for  
18 the Nuvia technology and Nuvia-based  
19 products including how, if at all,  
20 those development plans changed  
21 following Arm's termination of the  
22 Nuvia ALA."

23 You are prepared to testify on that topic  
24 today?

25 A Yes.

1 Q The next topic is Topic 31. It is:  
2 "Qualcomm's or Nuvia's  
3 commercialization of the Nuvia  
4 technology and Nuvia-based products,  
5 including, without limitation, the  
6 timeline for commercialization, any  
7 verification process for such  
8 products, and the manufacture of any  
9 such commercial products."  
10 You are prepared to testify on that topic  
11 today?

12 A Yes.

13 Q Next topic is 33. It is:  
14 "Qualcomm's or Nuvia's  
15 sampling, attempts to achieve design  
16 wins, achieved design wins,  
17 attempted sales, sales, and  
18 distribution of the Nuvia technology  
19 and Nuvia-based products."  
20 You're prepared to testify on that topic  
21 today?

22 A Yes, as much as I recall.

23 Q And the last topic for this notice is  
24 Topic 36, which is:  
25

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[REDACTED]  
[REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

You are prepared to testify on that topic today?

A Yes.

MR. BRALY: I just want to put on the record that we reserve our objections to all of the 30(b)(6) topics as stated in our responses and objections.

MR. MUINO: Mr. Asghar, I want to show you a second deposition notice. We'll do this one faster. This will be Asghar Exhibit 3, and it is "ARM, LTD's First Notice of Deposition of Nuvia, Inc. Pursuant to Federal Rule of Civil Procedure 30(b)(6)."

(Plaintiff's Exhibit 3 was marked for identification by the deposition officer and is attached hereto.)

BY MR. MUINO:

Q Do you understand, Mr. Asghar, that you have been designated to testify on certain topics set forth in this document as well?



1 A As 30(b)(6), yes.

2 Q And I'll direct you to those topics.  
3 They're largely similar to the ones we just read, so  
4 I won't read them into the record, but I'll ask you  
5 to read them to yourself. If we could look at Topic  
6 No. 12, please, just read that to yourself.

7 A Yes.

8 Q Topic 16 on page 9, if you could read that  
9 to yourself.

10 A Yes.

11 Q Topic 25 on page 11, if you could read  
12 that one to yourself.

13 A Yes.

14 Q Topic 26 on that same page.

15 A Yes.

16 Q Topic 27 on that same page.

17 A Yes.

18 Q And Topic 32 on page 12, please.

19 A Yes.

20 Q You understand that you have been  
21 designated to testify on these topics 12, 16, 25,  
22 26, 27, and 32; correct?

23 A Yes.

24 Q And are you prepared to do so today?

25 A Yes.

1 MR. BRALY: We also reserve our objections on  
2 the 30(b)(6) topics as stated in our responses and  
3 objections.

4 MR. MUINO: All right. I'm going to mark the  
5 next exhibit. This will be Exhibit 4, which is a  
6 document that starts with Bates label ARM\_55357, and  
7 it is the "Amended and Restated Architecture License  
8 Agreement Between Arm and Qualcomm."

9 (Plaintiff's Exhibit 4 was marked for  
10 identification by the deposition officer and is  
11 attached hereto.)

12 MR. BRALY: I also want to state on the record  
13 for the 30(b)(6) topics, we're not going to object  
14 to scope for the questions, but we're reserving the  
15 right to those objections as well.

16 BY MR. MUINO:

17 Q Mr. Asghar, do you recognize this  
18 document?

19 MR. BRALY: Do we have an agreement on that?

20 MR. MUINO: Yes.

21 MR. BRALY: Okay.

22 THE WITNESS: I've seen parts of it because I'm  
23 more focused on the product side, which is the  
24 financial part of it.

25 ///

1 BY MR. MUINO:

2 Q You have reviewed this ALA before, at  
3 least parts of it?

4 A Limited parts of it.

5 Q Do you recall when you first reviewed some  
6 parts of the ALA?

7 A I don't know the exact date. I don't  
8 recall.

9 Q And when you did review parts of this  
10 Qualcomm ALA, which parts did you review, do you  
11 recall?

12 A Yes, since I'm on the product side,  
13 typically I'm focused on the financial terms.

14 Q Financial terms, you mean -- what do you  
15 mean by that?

16 A Royalty rates and so on.

17 Q What was your purpose for reviewing those  
18 parts of the ALA?

19 A In creating the CPU technology Roadmap for  
20 Qualcomm, we, of course, want to understand  
21 everything about that technology in terms of how  
22 much would it cost us to be able to commercialize  
23 the product base.

24 Q You need to know the royalty rates under  
25 this agreement; correct?

1 A (Witness nods head.)

2 Q Is that correct?

3 A Yes.

4 Q We'll refer to this today as "the Qualcomm  
5 ALA"; is that okay?

6 A Sure.

7 Q The effective date of this [REDACTED]

8 [REDACTED]

9 Do you see that at the very top?

10 A [REDACTED].

11 Q It says [REDACTED] at the top. The first  
12 sentence says:

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 A Sure.

18 Q Do you see that? At that time, May 30th,  
19 2013, you were the director of QCT strategy. Does  
20 that sound right?

21 A Yes.

22 Q Were you involved in the negotiation with  
23 Arm for this ALA?

24 A No, I wasn't.

25 Q Do you know who was involved on the